

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

Ref:

(For official use only)

The paper 'Addressing climate change and biodiversity net gain through the Local Plan - raising the ambition' outlines the challenge of climate change, describing how the preparation of the Wiltshire Local Plan can, in part, help address the issue.

To view the paper please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable) *
Title	Ms	
First name	Annie	
Last name	Child	
Job title (where relevant)	City Clerk	
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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:

No, it is probably not reasonable to expect this. Land use planning can only affect new development and therefore, though policies may have a positive impact on new development, it will have no impact upon existing development, where land owners do not intend to improve their carbon footprints.

However, planning policies can help deliver long term change in support of other policies and techniques.

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

Answer:

- Better investment in walking and cycling infrastructure.
- Improved development management decisions that require walking and cycling infrastructure to be included in all new development.
- Setting of standards and targets for roll-out of an electric vehicle recharging network.
- Better understanding of the viability implications of walking and cycling and improved building performance, so that policy aspirations can be delivered in all decisions.
- A more refined and integrated approach to the inter-relationship between Green Infrastructure, biodiversity, flood management and walking and cycling.
- Identification of areas where energy generation would be feasible (i.e. identification of places where grid connections are favourable and available).
- Better integration of waste policies to identify opportunities for combined heat and power.
- Better policies that encourage the development of new recycling technologies.
- Better policies on battery storage of excess electricity generated.
- Better policies and setting of standards for public buildings on how to improve the performance (heat, cooling, lighting etc) of existing buildings, particularly those in conservation areas and with historic designations.
- Identification of areas of country parks/reserves to remain in private ownership and in current use, preferably in low intensity agricultural production with an emphasis on management for wildlife to support ecosystem service delivery and greater public access. This approach is in line with the Government's 25 Year Environment Plan and forthcoming Nature Strategy, plus the forthcoming Agricultural Bill.

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

Answer:

Each policy should be monitored.
Planning conditions should enable monitoring of all development.
Advances in communications technology allow remote monitoring generally.
Government funding could be sought for projects offering significant employment opportunities.

**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 Climate Change document does not describe natural capital and there is nothing about the Government's Nature Recovery Networks.
- It is necessary to move from the currently proposed 20% betterment to 50% or 70% betterment in areas of known flooding. A 20% betterment has been shown to be inadequate in the St Peter's Place first phase of development under moderate rainfall on 04 Oct 20. Once development is in place, it is too late to correct the assessment and evidence suggests this must be more ambitious.
- Agree that SuDS should be multi-functional and that they should be retrofitted where necessary to bring up to current expectations. SuDS are a key aspect of GBI. Their long term management in urban areas is an issue, as is their design and management in recent large scale housing developments.
- All development (not just new development) should be encouraged to reuse rain and grey water. Suggest that policies make it easy to retrofit existing development to do this.
- Support the use of permeable material rather than hard standing wherever possible.
- Natural flood management is supported, but it is not appropriate for "all new development" - this needs to be refined.

**Consultation Question B2:
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:

- Not sure if "development" should be ambitious in enhancing GBI assets – this is a matter for policy to set out and for development to deliver.
- Agree that major development should be supported by a GBI audit.
- Appropriate new development should be required to increase overall tree cover, using local species where possible.
- For biodiversity gain offsite, the LPR needs to set out exactly how this should be done, for instance by setting out a list of sites where improvements are required, perhaps in agreement with Wiltshire Wildlife Trust and Natural England.
- Agree 30 year maintenance programme. Also need protection against redevelopment /loss after 30 years. Consider using Local Green Space or similar designation to provide long term protection for all schemes over a certain size/impact.

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:

- Yes, the LPR should set out clear standards for new built development.
- It should also contain policies on upgrading existing development to make it easy to improve building performance in existing structures.
- Support requirement for Sustainability Statement
- Need a specific standard on the number and location of EV charging points (i.e. x per number of bedrooms of new housing schemes, etc.)
- Support retrofitting existing buildings, which should not be limited by statements like “where practicable”, but “where possible”. Special consideration needs to be given to the historic environment, which is problematic and for which there is no clear national approach or guidance.

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, if the LPR policies are ambitious and set clear standards, which are enforceable by Case Officers in the decision-making process. To do this, the LPR must pay special regard to viability when preparing its policies.

Consultation Question B5:

Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Please explain your answer

Answer:

Yes, see previous response.

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:

Performance standards for new buildings should always be in line with Government guidance or they will risk challenge by developers.

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:

- Update all conservation area statements with special regard to retro-fitting historic and scheduled buildings.
- Set out clear policies on how individual components of listed buildings can be upgraded, for instance, a specific policy on how to replace or improve the thermal performance of windows in listed buildings.
- The lead must come from Government or face challenge by building owners; however, Council could develop policies that require retrofitting and modernisation of existing buildings whenever planning applications for development of them come forward.

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:

- Council has to show leadership and be prepared to introduce policies that might not be popular. Rescinding policies already operating gives the impression the policies are not sound and encourages those affected to increase pressure to have them removed.
- As stated above, need to account for battery storage (in residential units as well as commercial, and perhaps communal storage for major new schemes that will generate excess electricity during daylight hours, but require energy after dark).
- Policies on how energy should be generated in all development, i.e. how to position solar panels in a conservation area and how to position it elsewhere etc.

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 should be favoured. However, since the plan will be reviewed in 5 years' time, current technologies should be considered in detail and their installation should be facilitated, not just "supported".

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:

- Yes, in consultation with Government departments, particularly with regard to the EV recharging network.

- 'Energy consumed vs energy generated' statement required for new development, requiring metred results with online reporting systems run by WC.
- Energy efficiency rating of building.

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:

Set out a palette of acceptable materials, favoured building components, solar panels/tiles etc, so that the incorporation of these elements could be checked off in the energy efficiency statement.

Set standards for heating and lighting, including motion sensors, with target dates for achievement.

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:

This is a nonsense in Salisbury where the proposals for Churchfields to increase economic activity will lead to increased traffic through the AQMA. The LPR must be consistent throughout and not have "good" policies that seek to reduce pollution and then have other policies that exacerbate it.

Council leadership should be prepared to withstand pressure from vocal groups to implement policies to improve air quality and provide an improved City Centre environment.

Consultation Question B13:

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:

- Set out clear routes using LT1/20 as basis.
- Development management decisions need to require sustainable transport policies to be delivered, which they have not been to date in Salisbury.
- Set out clear policies which require effective cycling and walking infrastructure to be fully integrated with the local GBI strategy.
- Invest in public and active transport.
- Reduce city centre car parking provision.
- Use contract provision to create incentives for bus companies to introduce EVs.

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:

This is a technical question for DNOs/DSOs.

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:

- New housing development should anticipate home working and new buildings should be designed to enable this to happen.
- Flats should have access to a private garden or balcony that is large enough for a table and chairs and outdoor clothes drying.
- All new development should have superfast broadband connections.
- All new development should have adequate storage for cycles, either individually or for groups of houses, and sufficient access to EV recharging sites.

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

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

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