



South Wiltshire Core Strategy

Topic Paper 1 Addendum 2:

Climate Change

July 2009

SALISBURY DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK

TOPIC PAPER 1 SECOND ADDENDUM:

CLIMATE CHANGE

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1. Introduction

- 1.1. Climate change is an issue which permeates all aspects of the South Wiltshire Core Strategy and subsequent Local Development Framework documents. The location of new development can have a huge impact on how far people have to drive for work, leisure and home. This in turn, can have a major impact on the CO₂ emissions which is the main greenhouse gas which contributes to climate change. The CO₂ emissions from domestic housing account for around 27% of the UK total¹. Of this 27%, over half comes from the energy needed to provide heating and hot water. Non domestic development also contributes to the UK CO₂ emissions total.
- 1.2. The previous topic papers did not deal specifically with the issue of tackling climate change through transportation policy or through the location of development. They instead concerned themselves with the core strategy response to energy efficiency and renewable energy.
- 1.3. This is not to say that the contribution of transportation and the location of development were ignored. Reducing the need to travel and hence generate CO₂ is the very foundation of the settlement strategy for the Core Strategy. The settlement strategy relies on the principle of locating development in settlements with the best access to services and facilities. By doing this, it should be possible to reduce the need for people to travel to essential services and facilities. At the same time, locating a higher proportion of development in the larger settlements offers the best chance of delivering modal shift from the private car to other forms of transportation.
- 1.4. This paper does not deal specifically with these policy issues as they are tackled in the settlement strategy and transport topic papers. Instead this topic looks at the core strategy response to climate change through the provision of renewable energy and energy efficiency.
- 1.5. This paper should be read in conjunction with the original topic papers and their associated addendum papers. This topic paper summarises the results of the preferred options consultation and the preferred options 2 consultation. It also considers any updates to national and regional legislation and makes recommendations for policies in the submission draft of the core strategy.

2. The previous rounds of consultation

¹ Building a Greener Future: Policy Statement DCLG July 2007 www.communities.gov.uk

- 2.1. Both the Issues and Options and Preferred Options consultations contained references to the reduction of CO₂ emissions through the design of new buildings. The responses to the issues and options consultation are contained within the addendum to topic paper 1 which was issued to coincide with the preferred options consultation in early 2008.
- 2.2. The issues and options consultation suggested that new dwellings should be built to a high standard of energy efficiency and that 10% of the energy used by the dwelling should be generated on or near the site. The preferred options raised the amount of renewable energy which would have been required to be generated onsite from 10% to 20%.
- 2.3. This change was in line with the alterations suggested to draft RSS policy RE5 in the Panel Report. The preferred options consultation also included the panel reports recommendations to require developments to achieve specific ratings on the Code for Sustainable Homes (CfSH). These alterations were contained within option 5 of the preferred options consultation.
- 2.4. Preferred option 5 also suggested that the core strategy supports the provision of renewable energy more generally in the form of larger scale renewable energy developments. Comments received on this issue, both in the Issues and options and preferred options consultation indicated a presumption against wind energy. National planning legislation does not, however, enable a local planning authority to preclude a certain time of technology.
- 2.5. Although the data collected during the preferred options consultation is qualitative rather than quantitative, 38 of the 56 responses to preferred option 5, energy supported the adoption of the suggested policy. This equates to approximately 67% of respondents being in favour the approach.
- 2.6. The free text comments received during the consultation highlight three distinct areas where the opinions differed. There are those that support the suggested approach, those that think it to weak and those that express caution. These can be summarised with the examples below...

'The need for new development to contribute to tackling climate change is recognised; however, this should not restrict or stifle development.'

'The PPS1 Supplement should be followed with regard to ensuring that the LDF does not repeat building regulations and utilises national measures (i.e. CfSH and BRE measurements)'

'We support the highest possible standards for energy efficiency.'

'20% minimum is far too low a proportion for renewable energy. Surely the aim should be virtually 100% for new developments?'

'There should be tougher / more rapid targets in the tables under this option, aiming for an 80% cut by 2050.'

2.7. Further comments were received which referred to the link between climate change and transport as well as the issue of retrofitting renewable energy technology and improving energy efficiency of existing buildings.

2.8. On the issue of retro fitting buildings with renewable energy technologies it is important to note that there little scope to deal with this in the Local Development Framework. However, recent alterations to national planning legislation have enabled many renewable energy technologies to be installed with out planning permission.

2.9. The preferred options II consultation which took place between September and October 2009 did not include any specific questions relating to climate change. However, there are a few free text comments that have been made on the issue. These were generally supportive of the principle of requiring new development to incorporate energy efficiency measures and renewable technology in new developments. These comments can be summarised by the quotes below.

'I strongly believe that the inclusion of renewable sources of energy in all development applications should be compulsory and not just offered as an optional extra. This should be in addition to all, high quality thermal insulation.'

'All new housing should be energy efficient and self efficient. We desperately need to make more use of solar panels and other green sources; extensive use will reduce their costs.'

3. Updates to the previous rounds of consultation

Renewable, low carbon, decentralised energy and energy efficiency

3.1. National guidance on renewable energy is held within the Planning Policy Statement (PPS) 22 and the *'Planning and Climate Change'* Supplement to PPS 1. Both of these documents were published at the time of the preferred options consultation. The national planning guidance remains unchanged at the time of writing this addendum.

3.2. Since the publication of the preferred options consultation document, the Secretary of State (SoS) has published proposed changes to the RSS. These changes take into account the Panel's recommendations, but, with

respect to the policies relating to sustainable construction (Policy G) decentralised energy (RE5), the changes are significant.

- 3.3. The Government set out its commitment to achieving zero carbon housing by 2016 and zero carbon non residential development by 2019. The main way of measuring and quantifying the sustainability of new development is through a rating standard. The CfSH and the Building Research Establishment Environmental Assessment Method (BREEAM) are two such standards which give a level or star rating as to the sustainability of development. These methods are not solely confined to energy efficiency or renewable energy but also include wider sustainability considerations such as water usage, lifetime emissions and proximity to facilities.
- 3.4. Currently the Building Regulations set national standards for energy efficiency, while the local authorities have planning powers which can be used to set higher standards. Central government has committed to setting a strong national framework for lowering carbon emissions. From May 2008 all new dwellings are required to have a CfSH rating in the Home Information Pack (HIP) and from April 2008 all new social housing must be built to CfSH level 3. Further improvements will be made by tightening the Building Regulations and the requirements of the CfSH.
- 3.5. The recommendations of the Panel (and those consulted on in the preferred options) would have required stringent energy efficiency standards to be introduced in advance of those set nationally. In light of the SoS changes to the RSS, it is evident that the government's stance on energy efficiency is to reduce carbon emissions through the Building Regulations. The approach relies on the national framework to deliver improvements rather than ad hoc requirements set by individual Local Planning Authorities (LPAs) or Regional Planning Bodies (RPB's).
- 3.6. As well as changes to policy G of the RSS, the SoS has also changed policy RE5 which relates to the provision of renewable energy technologies in new development. Policy RE5 of the original RSS set out a requirement for large developments to provide on site renewable energy to reduce CO2 emissions by the equivalent of 10%. The suggested change in the Panel Report raised this requirement from 10% to 20% for all domestic and non domestic development.
- 3.7. As mentioned above, the preferred options consultation included a policy (PO5) as worded in the RSS panel report. The SoS changes to the RSS alters the emphasis of policy RE5 so that it was brought in line with the Planning and Climate Change supplement to Planning Policy Statement (PPS1). The SoSs changes to the policy recommend that LPAs should set local targets for requiring new development to include renewable, low

carbon or decentralised energy technology. However, change also requires that LPAs to have evidence based understanding of the local feasibility for including such targets in DPDs. The main purpose of this change is ensure that the requirements for renewable energy are not so onerous as to impact on the viability of schemes and therefore the delivery of houses.

On-shore renewable energy and heat

3.8. While policy RE5 and Policy G of the RSS dealt with energy efficiency and the provision of renewable energy in new development, policies RE1 and RE2 of the RSS deal more generally with renewable energy.

3.9. These two policies establish regional targets for the installed capacity for the generation of renewable electricity and renewable heat. The policies make the distinction between two forms of energy. Electricity which is the flow of electrons to power electronics and electrical equipment and heat which is produced when combusting fuel.

3.10. Different types of technology are used to generate these two types of energy. For example solar energy can be used to either generate electricity (poly voltaic cells) or heat water (evacuated tubes).

3.11. In terms of electricity, the SoS changes to the policy RE1 of the RSS require the South Wiltshire LDF authorities to contribute towards the regional target of between 509-611 MWe by 2010 and 850 MWe by 2020. The RSS includes a broad regional distribution for the 2010 target. This recommends that between 65-85 MWe should be provided in Wiltshire which equates to about 12% of the regional target. No equivalent distribution is provided for the renewable electricity target for 2020.

3.12. Policy RE3 (Renewable Heat) of the RSS requires LPA's to include positive policies in their LDD's that will enable a target of 100 MWth installed capacity to be achieved by 2010 and 500 MWth installed capacity by 2020.

4. Suggested Policies for the Core Strategy

4.1. Energy efficiency in new In light of the national framework and the changes to the RSS proposed by the SoS it is proposed not to have a policy in the core strategy relating to energy efficiency. At the time of writing, there is no evidence suggest that more demanding standards can be achieved locally without affecting the viability or deliverability of development. It may be possible to provide policies and evidence at a later date through the production of further DPD. The timescale for the production of such a document will need to be considered by the new

Wiltshire Council as the current adopted Local Development Scheme does not factor such a DPD into the timetable.

4.2. On site renewable, low carbon and decentralised energy as with energy efficiency requirements, there is no evidence available at this time to justify higher rates of renewable energy being required. In light of this, no policy on onsite renewable energy will be included within the core strategy. More demanding requirements could be included (if justified) in a subsequent DPD but the timescale for the production of such a document is unclear. However, it should be noted that the RSS will form part of the development plan so policy RE5 of the RSS will apply to all development.

4.3. Renewable electricity and renewable heat developments

Core Policy 9 - Sustainable development

Proposals for both renewable electricity and renewable heat development will be supported where:

- The proposal, including any related infrastructure such as transmission lines, buildings or access roads etc, has no significant impact on local, national or international nature, heritage, or landscape interests.
- Proposals in, or adjacent to, the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, Special Areas of Conservation, Special Protection Areas, Ramsar sites, the Stonehenge World Heritage Site or the New Forest National Park should be of an appropriate scale so as not to compromise the objectives of the relevant designation.

Where development is permitted, the Local Planning Authority will secure, via condition or legal agreement, mitigation measures that may be required to minimise any environmental impacts.

4.4. Monitoring for this policy will be the amount of installed renewable electricity (MWe) or renewable heat (MWth) capacity and will be presented in the Annual monitoring report.

5. Changes as a result of Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment and editing refinement

- 5.1. The draft core strategy and the initial policy text shown above were subjected to a sustainability appraisal (SA) and also appraisal under the Habitats Regulations, Strategic Environmental Assessment Regulations. These appraisals produced a number of recommendations for how to improve and strengthen the policy
- 5.2. At the same time as the SA, SEA and HRA assessment of the core strategy, the initial draft was subjected to editing to ensure that central and regional policy are not repeated and to take account of recommendations for Government Office of the South West (GOSW). These editing changes resulted in numerous structural changes to the document and also the removal of a number of policies.

Suggested Changes

- 5.3. The SA/SEA appraisal of this policy concluded that it performs well against the sustainability criteria. The SA/SEA concludes that the policy strikes a balance between encouraging renewable energy development, whilst ensuring that South Wiltshire District's distinct landscape, biodiversity and heritage are preserved. In light of the fact that no adverse impacts were highlighted, the SA/SEA has not recommended any changes to the policy.
- 5.4. This policy has been screened out of the HRA and can effectively be dealt with at the project level.
- 5.5. The editing refinement of this policy led to the policies deletion for the core strategy due to the fact that it was not locally distinctive enough and repeated national and regional policy.
- 5.6. It was also concluded that further investigation was needed in order to better understand the local circumstances in relation to renewable energy. This would be better looked at holistically across the whole of Wiltshire not least because the targets expressed in the RSS are set on a Wiltshire wide basis. As a result of this, the renewable energy policy in the core strategy has been deleted and will be looked at in more detail in subsequent DPD.