

Rep ID: Climate1	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<p>I could find no mention how residual carbon emissions are to be compensated for. No mention is made of what steps are to be taken towards implementation of the Government's policies for planting more trees. Government advice to Local Authorities is set out in https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892714/Responding_to_the_climate_emergency_with_new_trees_and_woodlands.pdf This says ".....The final step in the process [of planning to achieve</p>	

net zero] should be to calculate how to make good for these [residual] emissions. Here we are therefore looking at how much woodland is required to offset the residual emissions over the period of the 'net-zero strategy'. This can be done by dividing the residual emissions by the tonnes of CO2 captured by the type of woodland to be created."

A3: How should these actions be delivered and measured?

Targets should be set for tree planting in each area plan - just as targets are being set for new housing

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

Not necessarily. This should be backed up with a planned reforestation of the Bristol Avon catchment, and in particular the River Biss Catchment to reduce the dangers of flooding in Trowbridge, Chippenham, Melksham and, downstream, in Bath and Bristol

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?

In assessing biodiversity net gain proposals, account should be taken of the biodiversity that already exists on the chosen mitigation site to make sure that we are not robbing Peter to pay Paul.

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?

What steps are to be taken to deal with residual carbon emissions?

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?

is "zero carbon achievable" a new unit of measurement? If so, how is what is deemed to be "not achievable" to be addressed? What is needed is a landscape-wide strategy to deal with these, including planting more trees

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

We have no choice if we are to avoid a climate catastrophe

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Whatever regime is adopted, it needs to be backed up with a rigorous inspection regime to ensure compliance and proper interpretation of the regulations - we cannot afford a repeat of the Grenfell experience

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

A system of attractive incentives which encourages owners to take the necessary steps - my solar panels are the best investment that I ever made

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?

For conservation areas the possibility of area heating schemes should be explored, for example using the rivers as a heat source.

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

Picking winners is never easy; it would be a pity if policy decisions taken now were to exclude development of new technologies that emerge in the future.
For example, using farm manure to generate heat

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?

Yes it should and this should not be confined to buildings - faring activities are one of the worse "offenders" (if that is the correct word) and should be included in any plan

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?

This could be done on an area basis

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?

Farming activity needs to be included

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?

A network of long distance footpaths and cycleways should be developed. All new developments should have easy links to these

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?

This needs to be linked with local (distributed) generation and incentives to reduce electricity consumption (insulation of homes and businesses, LED lighting etc)

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?

Increased capital cost would be balanced by extremely low running costs. Energy savings could be used to offset higher mortgage costs and be future-proofed against inflation- it should be possible for developers to devise publicity schemes which

improve the attractiveness of such homes - just as publicity is encouraging the purchase of electric cars which are dearer to buy but cheaper to run

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

•Are the proposed Blue and Green Infrastructure Routes proposals for footpaths and cycleways, proposed wildlife connectivity routes or a mixture of both?

Rep ID: Climate2	
Consultee code: General Public	Consultee Organisation (if applicable): Lick the Spoon Ltd
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Yes - it has to. The problem with the initial policy proposal is so many houses are allocated it will be almost impossible not to increase emissions, build on greenfield sites and destroy biodiversity and agricultural land.</p> <p>The council, recognising the emergency that has so clearly been defined should push back on government where greenfield building is required. It would be madness and a gross act of intergenerational injustice not to do so.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Stop expanding the existing geographical boundaries. Adopt Doughnut economics. View each settlement as needing to start within its own 'planetary' boundaries. The Chippenham area for example is surrounded by farmland. These shouldn't be viewed as developer fodder, they are a valuable resource that will be needed to sustain the people of Chippenham as global food supplies destabilise. For example <https://www.smartcitiesworld.net/news/news/amsterdam-adopts-first-city-doughnut-model-for-circular-economy-5198>

A3: How should these actions be delivered and measured?

With a lot more urgency than is currently being deployed. Firstly all get on the same hymn sheet - stop certain from sharing dubious climate denial science and if they are too invested in oil fired heating replace them with someone fit for the role with objectivity and leadership. Push back on the housing allocation. Suspend all development on greenfield sites allowing brownfield only. This is an emergency, we have to act now. The very fact you put question A1 demonstrates a complete lack of understanding of the scale of the problem.

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

There are some good suggestions here. Though proposed housing allocation next to the river in Chippenham is not wise from a biodiversity and flood perspective. Note typo in document 'Passivehaus' should be 'Passivhaus'.

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?

Well that depends doesn't it. If you build 10k houses next to the Rivers Avon and Marden and offset it by planting a wildflower meadow in John Coles park claiming net biodiversity gain - clearly not. If you build on a brownfield site, enhance the soil and natural environment, then possibly.

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?

Well they will certainly help. It depends on government policy too. You could go further in terms of the way the economy of the development is designed, using planning to favour the circular economy - adopting Doughnut economics as Amsterdam has done. Considering the overall ecosystem. Waste systems creating fertiliser, to grow local crops.... reed beds to filter waste water. Cociting businesses that can work in a circular way.

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?

Why wouldn't it be achievable? We know we have to do this and the buildings we put in place now will last for decades. Studies from the University of Bath and local architects indicate a 10% increase in upfront building cost will lead to housing that is many times cheaper to run over their life time.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

We have to do this. It's not an option. The question is irrelevant. A new, energy inefficient building built today will continue to be inefficient long after its occupants have bought new efficient cars or computers. An inefficient building- may cost a factor of 30 times more to heat than an energy efficient one. According to the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide new construction accounts for about 10 per cent of our national emissions and the figure is increasing as other sectors decarbonise. Taking 2017 as an example, this 10 per cent amounts to 46 megatonnes of CO2. Looking ahead,

that figure is about 64 per cent of our annual carbon budget in 2050 (which is 71 megatonnes of CO2 according to Carbon Brief). So we need to implement sustainable construction techniques today. Professor David Coley of the University of Bath asks the question in relation to Climate Change - "Are we who commission, purchase, design, build, operate, or occupy (energy inefficient) buildings evil?" He goes on to answer - "The sad truth is that, unlike other sectors, we do know how to do this, and in a cost-effective way. This is our first hint that we might be evil, as we are clearly consciously not doing so." Fortunately as Professor David says we do know how to do this, and the truth is we have done for a very long time. In HSBC's Made for the Future report 63% of companies planned to update buildings and equipment citing operational efficiency, keeping up with competitors, and changing regulations as the three biggest factors behind green investment plans. So to attract and retain these businesses we need to construct commercial premises that meets these rapidly changing needs with regards to sustainability

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The best we can do as recommended by the climate committee. Passivhaus is well known but is a brand.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Well one challenge faced is trying to find contractors to do the job. I have no cavity wall insulation in my house but trying to find a contractor to do the work has proven difficult. I have yet to receive a reply. Similarly trying to install an electric charging point on my work premises using the government grant proved difficult to find a contractor either capable or willing without excessive charges. So I will probably do it myself. An obvious easy win is LED lighting, particularly with recent introduction of fluorescent tube replacements. The payback is so short. Can the council force businesses to switch to LED lighting or increase business rates as a carbon tax for those that don't. Or hide it and offer lower business rates for those that do? This has to be such an easy thing to do as the payback is so short. In terms of heat pumps we were able to persuade Good Energy to reduce our direct debit and refund overpayments based on future savings - which did materialise and we pay £50 a month less since installing a heat pump and LED lighting.

It's clearly a massive task but one that reduces running costs longer term.

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?

It's certainly a good start. I don't see small scale wind mentioned. Also biomass from waste food. We have no food collections in Wiltshire and I certainly compost. But lots of houses don't have gardens. Could we have local food collection and biomass? BECS and Biocharr?

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

Hard to say. I think across the board but bow to those with greater expertise. I've installed home solar and it is brilliant in the summer but the seasonal variation is large.

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?

I think so yes.

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?

There are advances in solar such as solar tiles and even printed solar cells OPVIUS GmbH. An example of a problem I have. I have an industrial unit that I would like to put solar on. The unit is owned by a SIPP pension scheme in which there is excess cash that I would gladly use to install solar. But the SIPP won't let me because they say the panels are classed as portable/removable and the electricity would go to the tenant ie my company and HMRC wouldn't support it. My company can't quite afford the capital investment, even though as a chocolate company we use almost all cooling, no heating, entirely from heat pumps, so our usage almost perfectly matches peak solar generation. Something that has excaberated me for 10 years. So for example if the council were to somehow fund Lick the Spoon to install panels, maybe there is some way LTS can pay them back through savings in electricity. It is frustrating but an example where perhaps a change in SIPP pension law could help climate change!

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?

They certainly help. There is a continued emphasis on road transport. Can we relook at Corsham station again. More cycle paths. Electric bike schemes? Walk/cycle to schools. limit school drop off parking.

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?

A list of contractors and typical prices that will be stuck to. It seems that with government grants a free for all has occurred resulting in very high quotes for installation. Use of bulk buying power?
Local map offering charging rates based on local energy production?

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?

Certainly undertake a study. Some form of smart charging or encouragement to charge at times when local production is high. For example I charge when i'm generating solar, but this is only possible with flexible hours and in the summer, and because I monitor my generation. There are smart sockets. Charging points linked to localised solar that offer reduced rates when solar is at peak.

Hydroelectric charging at the chippenham weir? Enhanced use of electric bikes. Electric bike conversion schemes. e.g. Swytch bike that I use. Much more efficient than a car.

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?

Well 1. We have to do this, not an option to not do it. Much better and more affordable to live in. If the schemes don't go ahead, it doesn't matter because we have a limited time to act. New builds will ultimately add to the carbon footprint. So really prioritising improvement of existing building is the priority.

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

Some good proposals here. We have to do this so all the questions regarding viability etc are irrelevant and shouldn't even be asked as a question.

Rep ID: Climate3	
Consultee code: General Public	Consultee Organisation (if applicable): Sustainable Devizes
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes. The current trend for new housing developments on the periphery of towns, with residents dependent on private motor vehicles is clearly contributing to the rising emissions. It is reasonable to assume that Local Plan policies could arrest these trends and hence limit future emissions.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Firstly it is a case of stopping the increase in emissions. The construction of every new building causes significant emissions and further future emissions are triggered by the lifestyle of those who then live or work in the building.	

Both of these can be tackled in the local plan by:

- Including policies that mandate the use of lower carbon methods of construction
- Including policies that ensure buildings are designed, constructed and tested to meet the highest possible levels of in-use energy efficiency eg to the PassivHaus standard.
- Siting new housing close to amenities so that residents can meet most of their day to day needs by walking or cycling, and providing safe all weather routes for cycling and walking.

A3: How should these actions be delivered and measured?

- Design and construction standards should be enforced more thoroughly, for example air tightness testing should be conducted on all properties both at appropriate times during construction and after the final fit out. Mandating the PassivHaus standard may be one way to achieve this as it comes with a certification process.
- Delivery of safe walking and cycling infrastructure should be in advance of the sale of the first property on a site, so that residents can make immediate use of it.

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

Yes

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?

A policy requiring a minimum of 10% net biodiversity sounds great but could be open to wide interpretation. I would like to see more emphasis on protecting certain elements of nature. For instance it is not possible to replace ancient trees in any realistic timescale and so their protection is of more value than demanding that x saplings are planted to compensate for the loss.

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?

Some sort of testing / inspection / proof of energy use when occupied is also needed. It is clear that currently many new buildings are poorly built and fail to achieve the promised levels of energy efficiency. Going forwards this is incompatible with efforts to reach a zero carbon position.

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?

Technically it is achievable - we have been able to build houses to zero carbon standards for some time now. We should be applying a 'first off do no harm' principle to new buildings, so if they can't be built to zero carbon standards then they shouldn't be built at all.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It certainly requires developers to employ more skilled construction workers and architects / assessors, and in the short term at least will increase build costs. If schemes are not viable when built to a zero carbon standard, then they should not be built. The burden of making the buildings zero carbon by later retrofit is far greater than the additional cost during construction and should not fall on a future resident of the property.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Since scrapping the Zero Carbon Homes plan in 2015 the government have consistently failed to legislate for building standards that create the most sustainable buildings. Wiltshire Council should certainly push for policies that demand the most stringent energy efficiency standards, using a fabric first approach.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

One measure might be to be more accepting of alterations to improve the energy efficiency older buildings even when this drastically alters their appearance. For example the external insulation and rendering of brick buildings, or the installation of high performance windows into listed buildings - even when these do not match the original appearance. If we are in a climate emergency and heading for the breakdown of civilisation, then preserving the look of old buildings is somewhat irrelevant.

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?

These measures seem reasonable.

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

Perhaps discourage the burning of biomass, as it is rather questionable that this is actually zero carbon and it has a detrimental impact on air quality. Other than this no favour should be given to any particular technology.

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?

No. Focus the local plan on reducing energy use and emissions. Even renewable energy comes with an environmental cost, so the less of it we need the better.

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?

I think that in the light of the climate emergency we should be relaxing the rules regarding conservation areas and listed buildings. These areas and buildings are going to be of no use to anyone if society breaks down due to the impacts of global heating!

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?

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?

First off introduce policies that stop the creation of new housing estates which leave residents dependent on private cars - for example the planned development predicated on the creation of a new road to the east and south of Chippenham. If we build more roads we will get more cars. Secondly steer new developments away from the current pattern of providing a parking space outside each dwelling. Perhaps instead car parking should be in one area for the development with EV charging provided there

and residents forced to walk (or use a wheelchair) from their houses to the parking area. If this area were on the periphery of the site then the more central area would be more suitable for children to play in safety.

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?

There is certainly a need for suitable provision for fast charging in central town locations e.g. Devizes only has two 7kW charging points - too slow to be of much use. However from a planning point of view I feel that the main approach should be to reduce the need for private cars by meeting more of peoples needs locally.

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?

Solar PV is now quite cheap to install and so should have a relatively low impact on viability.

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

One aspect of climate change adaptation that doesn't seem to have been covered is that of food security. As the climate changes we are seeing global crop yields fall. It seems only a matter of time before crop failures strike in several regions in the same year. When this happens then our dependence on imported food will become all too apparent. So I would like to see policies around the provision of land for the growing of food by residents. Either by the provision of suitable spaces within developments or by the provision of allotment sites nearby.

Rep ID: Climate4	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Forestry Commission
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Every part of the Council's policy and strategy have a role to play in the adaptation and mitigation of Climate Change and Biodiversity Emergency	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
The protection and enhancement of the Green Infrastructure must be critical. The carbon emitted by development must be offset by carbon sequestration and biodiversity enhancement measures, these can be achieved at the same time by targeted woodland	

creation. This will also provide landscape enhancement and recreational opportunities amongst a range of other natural capital benefits. Other land use types will not provide so readily these benefits

A3: How should these actions be delivered and measured?

Developments that fully consider the full range of embodied carbon and show how they are taking steps to reduce should be favoured and considered alongside the proposals for biodiversity net gain

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

We strongly support the inclusion of a target for the creation of natural flood management measures. Creating wet woodland as a requirement of development will allow biodiversity gain and carbon sequestration if done at the appropriate scale alongside flood alleviation if in the correct location. A plan similar to the Poole Harbour catchment model could help form the link between landowners upstream and developers to ensure that the correct location can be made available for the creation of such woodland

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?

This question is difficult to answer without sight of the Wiltshire GBI Strategy however the intention to drive forward an ambitious programme is encouraging.

We would support a strengthening of the 10% Biodiversity Net Gain and note that this is a minimum requirement, development which attempt to achieve a greater gain should be favoured. Also it will be possible to ensure multiple benefits from the land use change required to deliver the biodiversity gain - if woodland creation is delivered it will also help offset carbon of the development, and provide cleaner air and water amongst many other natural capital benefits. This multi-use consideration to development gain must be embedded into the strategy to maximise benefits to Wiltshire's residents

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

A performance standard adopted should be one which includes a measurement of embodied carbon and this would ensure a movement toward using low carbon building materials such as timber. If this is from a sustainable UK source then the carbon in the timber would be locked up for a generation and the fossil fuel hungry alternative building materials would not be used. Any policy adopted should ensure this is included as it would help achieve a true zero carbon.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

Tree lined roads are hugely effective at removing pollution from roads especially their ability to absorb gaseous pollutant (ozone and nitrogen dioxide) and intercept particulates, in addition to the biodiversity and carbon sequestration benefits. Tree lined roads would also help soften road noise for residents. Any new road must therefore incorporate a considerable quantity of trees with suitable space for their growth and an adequate management strategy for their establishment (i.e. 30 year minimum)

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?

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?

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?

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

Rep ID: Climate5	
Consultee code: General Public	Consultee Organisation (if applicable): Wiltshire Resident
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Yes it is. But only if</p> <ol style="list-style-type: none"> 1. Policy is actively directed at achieving reduced CO2 emissions 2. Execution of Policy aims is closely monitored to ensure that the desired reduction in CO2 emissions is actually achieved 	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

A3: How should these actions be delivered and measured?

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

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?

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?

There are too many words giving space for wriggle room. "...not put at risk the viability of development". The carbon cost needs to be fully incorporated into the viability calculation. A development can't be considered viable if it does not meet or exceed the carbon reduction objectives. "Where practicable, support should be given to decarbonising and modifying existing buildings." The wording suggests the issue is not serious and actions can be relaxed with little consequence. If the council is serious about carbon reduction then the wording in policy documents must reflect this. Thus "Support shall be given..." should be the policy and it should be followed up with clear, measurable actions.

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?

It has to be made to be achievable.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Possibly yes. But I suggest that a scheme cannot be judged to be viable if the only way to achieve this is to exclude the environmental impact from its costs. And to permit the environmental impact to be excluded when assessing viability is an inappropriate and irresponsible course of action in an acknowledged Climate Emergency. We may temporarily deceive ourselves but the cost will bit back in the long run.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Householders require technical guidance and financial assistance to upgrade their properties. The Council has to find ways to deliver these if the challenge of upgrading teh existing housing stock is to be met.

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?

Its all far too wooly... "Where practicable and achievable, ..." implies that there is an alternative. Doing little or nothing is not a viable alternative. If producing and potentially storing ultra-low or zero carbon energy is not "practical and achievable..." why is the development considered viable? Even a subterranean dwelling could at least store thermal energy, e.g. in soil or water. As noted, the role of Community Energy organisations has so far been largely overlooked by the Council. These organisations already exist and are keen to deliver schemes for decarbonising energy production. Community Energy organisations by their nature tend to have significant existing community support and are well placed to build that support for new schemes. There is also strong evidence that Community Energy schemes generate more local jobs and more local financial benefit than do commercial schemes.

The Council needs to take on responsibility for defining a framework to establish acceptability of proposed energy production schemes. This should provide support for and specify a presumption in favour of approving schemes proposed by Community Energy organisations.

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

A portfolio of technologies should be encouraged, with technical guidance as to their applicabilities, so that each scenario can be match with appropriate technology(s).

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?

Yes. Production and use of renewable energy is key to the Council achieving zero carbon by 2030. Analysis is required to identify the energy needs of Wiltshire but the principle should be that Wiltshire shall be able to meet its own energy needs by 2030. Demand reduction will help towards this but significant generating capacity will be required.

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?

The first step is to quantify the problem. If the data is not currently available I suggest a widescale energy efficiency survey of the County's existing housing stock is urgently required to inform the answers to the questions. The survey would also capture and categorise the sensitivity of the housing stock. There is considerable existing expertise within the building industry on retrofitting energy efficiency in sensitive locations. Solutions may not be easy but are available and reasonably well understood.

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?

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?

Yes. Also the Council needs to ensure that there is a comprehensive network of publicly available rapid charging points within the County to remove concerns EV range.

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?

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?

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

Rep ID: Climate6	
Consultee code: General Public	Consultee Organisation (if applicable): Personal capacity
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Not if the rate of house and road building goes on as now. Housing based on an algorithm is faulty information as challenged by CPRE. South Wiltshire does not need 40k plus houses. It does need trees to be retained and planted everywhere. The current emergency has changed everything and all policies need to be examined and reset.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Reduce housing numbers, plant trees, hedgerows and wildflower meadows to capture carbon, reduce flooding (now very prevalent due to removal of trees and addition of buildings.) Fit PV cells on public buildings to reduce use of oil and gas, encourage wind farms, but not solar power in fields which should be dedicated to food production. Small scale hep on waterways.

A3: How should these actions be delivered and measured?

Stop the pre-emptive felling of trees by developers to aid house building - this is happening in Alderbury right now where hundreds of trees were felled in one area. All planning applications must have a tree planting scheme and mitigation for habitat loss. Local people should be properly consulted on the future development of their area (which is not apparent in the White Paper on the Future of Planning which speeds up decision making against the interests of local residents.)

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

There are a number of good measures above for reducing flooding but the first question should be - do we need this development? Given the lack of employment in South Wiltshire, the reduction in High Street shops, likely to increase, the new rules on immigration following Brexit, what evidence is there of housing, housing, housing? Many villages are now subject to urban sprawl with large numbers of executive houses, of poor or boring design standards on very small gardens which just leads to neighbour nuisance, reduction in wildlife, flooding. Little provision is built in for first time buyers, adapted housing for disabled or elderly. Flooding also applies to industry. The building of McDonalds on Southampton Road is a classic example or where not to build as it created flooding at the entrance to Tesco's after every heavy rain event.

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?

How will you enforce 10% net biodiversity gain? Who will maintain these sites to ensure wildlife flourishes? Air pollution is a significant problem in cities, towns and large villages and has now been legally linked to a child's death plus the increasingly high numbers of asthma sufferers shows how serious this is, so this should be addressed properly as a discrete issue with air monitors increased to measure quality.

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?

Probably not. Ground/air source heat pumps can be problematic for retro fitting to older buildings - there is no easy answer to this. Insulation for all buildings would help and replacing windows. PV on commercial buildings would also reduce carbon emissions. Wind farms should be encouraged.

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?

No. Pause new development until you are sure all the environmental measures are first in place. Help landlords in towns and cities to upgrade their rented accommodation or build on brown sites so that it is not necessary to build new houses on green field sites. This requires a holistic approach a real VISION.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

This should not be the main issue - economics are less important than green impact. You have declared a climate emergency and it is time to act on this. Developers are continually claiming they cannot produce 40% affordable housing as part of a new housing scheme - this is pure greed and has to be challenged if we don't end up with urban sprawl consisting of cloned executive houses in every settlement. Settlements require small developments of assorted housing types to allow local people to flourish there.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

We need far more ambitious designs which enhance the environment not ones that look like Toy Town, all the same. Obviously they need to be thermally efficient, well insulated etc but they also need a garden around them to capture carbon. Too many large houses are being built of a very high density with tiny gardens which are unsuitable for children or any use.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Tricky - there are currently not enough tradesmen able to keep up with the demand for insulation, heating etc caused by short lived government schemes. Petition for longer time scales?

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?

Waste to energy plants are in theory a good idea but how do you capture the carbon emitted? The national grid is currently struggling to accept community wind generation projects so I support the grid resilience measure above. People are concerned about 100% electric heating given the past performance where it is seen as very expensive. I support wind and hydro electric power, wave power and solar energy on roofs but not in fields as we need to cut food miles - we need to grow our own food as we rely less on Europe. Conservation areas must stay as they are. EVs are problematic because of the nature of the batteries using precious minerals. This needs addressing.

Recycling is an area that is often overlooked and the repurposing of plastic materials should go higher up the agenda. Could the council encourage enterprising individuals to set up places where people can refill plastic containers with washing up liquid, shampoo etc? We need to reduce plastic use.

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

Generally green energy ,yes. There are noise or air pollution factors in some technologies to consider but nuclear should be discounted - it is far too expensive and there is no solution to the dangerous waste generated, plus the building of such sites involves considerable carbon pollution so this should not be considered a 'green' energy solution, nor solar panels in fields when agricultural use is more valuable.

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?

Definitely - at least 50% in say five years.

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?

I don't have the knowledge to answer this but know that many older buildings are not suitable for heat pumps.

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?

Salisbury has mostly missed an opportunity to become a cleaner place to move around using walking and cycling measures and pedestrian only areas- the people friendly streets plan should be reintroduced ASAP. This applies to other major settlements and tree planting in pedestrianised areas should be a priority. These measures are urgent given the effect on public health of too many vehicles. Park and Ride schemes are excellent using electric buses which are brilliant. The over-engineered Stonehenge tunnel and road around Winterbourne is a massive indictment of WC's climate emergency claim. Any road building must be paused to look at the impact on health of excess carbon emissions and noise and air pollution suffered.

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?

Not sure EVs are the answer but more points would be useful or encourage people to have their own (possibly powered by solar panels on houses.) More people would use buses if they were available in the evening. Railway stations are insufficient in this area - eg the one at Salisbury has a very small and expensive car park. Opening up old railway lines / stations, lobbying for cheaper rail travel and possibly creating tram use are all visionary ideas.

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?

Only you know the answer to this - we do not hear anything from the distributors so maybe they need to emerge from the woodwork and tell us what the problems are?

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?

Build smaller scale. Smaller windows, inbuilt rain water tanks under or near buildings for garden use, no (or recycled only) plastic use in building schemes, higher levels of insulation, thicker walls. It can be done and still have good designs that are individual.

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

The plan for settlements needs to incorporate green lungs, amenity land with trees and meadow areas. New housing developments must be landscaped whatever size they are. Ponds could be established for wildlife. All wider highways verges could be planted with wildflowers and trees, and actions be taken to stop people parking on them. There is a serious issue with parked cars everywhere in villages so car parks need to be established for visitors, workmen etc and the use of cars discouraged by ramping up affordable rail and bus services. Old people do not need a free ride on park and ride buses so money for the above could be used by cancelling bus passes (or providing some subsidy but not 100%)

Rep ID: Climate7	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Yes if WC prioritise net zero or climate actions plans within the LP and also conduct policy and service reviews across the council to align policy, spending and functions with Net Zero in all areas of operation. However, the LP, especially the 'Planning for Chippenham' is at complete odds with this as it stands and will result in a RISE in emissions from house building taking us above not below our current 27% and cause extreme damage to the countryside and farmland. It will remove carbon sinks, releasing millions of tonnes of greenhouse gases. Although I see the plans include cycleways and walkways there is still a massive long road with viaducts over the River Avon which will increase road traffic and surely result in a RISE in Wiltshire's transport emissions of 40%.</p>	

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

Challenge Government on housing numbers for Wiltshire until they are able to roll out a Net Zero framework which aligns and clarifies national, sub-national, regional and local delivery roles with clear outcomes and direction to reduce uncertainty in regards to planning. Also ask them to increase funding and support for you to develop skills and capacity to plan and implement climate actions across both emissions reduction and climate adaptation in Wiltshire. This in turn will enable WC to set higher standards through the planning system. Yes we will need more houses in Wiltshire by 2036 but lets put the horse before the cart and do things properly. For example, in regards to monitoring and reporting on progress in reducing emissions. WC also need to communicate and engage with the local communities, businesses and partners on Net Zero and get everyone involved and engaged on the journey. One big area is to assess the skills needed locally to deliver the transition, developing green and low carbon jobs and also to invest in future innovation, technologies, provide training for WC staff including councillors and senior Directors. Liaise with Government re funding for this and for buildings and transport decarbonisation.

A3: How should these actions be delivered and measured?

Practically WC need to:

1. Put Net Zero targets at heart of all they do and work from that premise.
2. Work through all areas and publish clear targets on how they are going to support national target of reducing emissions by 78% by 2035 whilst ensuring a fair and just transition and equality for all.
3. Show inspiring leadership by supporting the good people of Wiltshire to reduce demand, improve efficiency and take up low carbon solutions. For example in relation to TRANSPORT - bring down emissions in transport by providing a modal shift to more sustainable models. It is good that future planning will include cycleways and walkways but needs to go much further and be more ambitious. We still need incentives and investment to encourage more use of public transport and discourage car use by parking charges, could more areas of Chippenham be closed to car access for example?
4. Establish pathfinder projects Wiltshire could lead on so we can toot our trumpet.

Wiltshire Council need targets and clear action plan re building low carbon homes and retrofitting existing homes. I appreciate you have identified that this needs to be done but now need clarity on how this is going to happen. The same applies to electricity generation, manufacturing and construction, low carbon farming practices and annual afforestation.

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

This is not my area of expertise but there is no mention of afforestation which has been shown to support flood risk? Again I reiterate we need to get our house in order (see previous page) BEFORE we build or develop or build any new houses or related infrastructure. Once this is in place all the 'SHOULDs' above need to be with clear ambitious targets and transparent monitoring processes for all the good people of Wiltshire to see.

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?

The emerging GBI is beautiful and aspirational, thank you WC, but in my opinion it needs clear, ambitious targets or could easily not be very effective and just look good. e.g. under Goal 2 - what is Wiltshire's target for woodland cover - we are lower than national average now right, should we not have a strong target to go for and be accountable for. How many right trees are we going to plant in the right places? Likewise under Goal 3 - there is no mention of the need for diet change / reduction in meat.

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?

Good measures. Do these also include public and commercial buildings? Do we need to model for impact of changing climate in UK? I think also WC need to add promoting behaviour change post construction as there are a range of steps Wiltshire residents can take to reduce and manage energy in their homes saving on both emissions and bills and these need to be promoted and encouraged by the council. E.g. turning off lights / pre-heating / smarter heating management and use / low-flow shower heads / hot water temperature / water softening etc.

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?

Yes, it has to be but again I reiterate that Net Zero has to be at heart of LP.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It may delay it slightly but that is better than doing it wrong. Horse needs to be firmly before the cart.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Government's proposed 'New Homes Standards'. High Net Zero standards and targets please.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Develop capacity to innovate and scale up - apply for more funding / train local workforce to fit ASHPs & technical development and know how of other low carbon solutions & at same time provide more local employment.

Develop green finance know how.

Campaign for public awareness of need for retrofitting and modernisation and current schemes available eg. Green Grant.

Education and training for all related WC staff, businesses and partners.

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?

We also need to outline options to reduce emissions from energy generation whilst ensuring security of supply and utilise the Greenhouse Gas Hierarchy as outlined in Appendix 1 Update for Councils Response to the Climate Change. Again there is no mention of the behaviour change needed from the public and how the users of the buildings can understand how to support or promotion of schemes such as the Green Homes Grant. Policy to tackle fuel poverty in line with a just transition is required. Finally, we need to ensure WC pension fund is investing in NZ aligned schemes - I appreciate this has started but is still low (20% I believe?)

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

Do you have a dedicated department at WC for this? Technologies are progressing quickly and there will be many innovations appearing in the near future. A team of WC staff dedicated to this and with expertise in this area will help us all stay ahead of the curve and ensure we are using the best technologies for Wiltshire. We can also lead by being a pathfinder for some of these and support new innovations & create skilled local workforce / employment in the area or in partnership with Swindon / other partners? Also see page 24 What WC Can Do - Appendix 1 - Update on Councils Response to Climate Emergency & section on Green and Circular Economy.

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?

Yes we definitely need ambitious SMART targets so we are accountable.
Targets on how much energy generated from renewable sources - currently only 6% at the moment.
Targets for no of houses with EPC ratings A - C

In line with Government Energy White Paper -
increase voluntary installation of heat pumps from 30,000 a year to 600,000 a year by 2028 – with a planned Clean Heat Grant to support installations from 2022.
phase out installations of gas boilers by mid-2030s – with all newly installed heating systems from this date being low-carbon or able to be converted to use clean fuel.
ensure new homes built from 2025 onwards are zero-carbon ready – including consulting on whether it's feasible and appropriate to end the connection of new-build homes to the gas grid.

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?

Access national funding streams
Educate and inform public so they are on board
Dedicated department at WC to support residents, installers, businesses and partners and research latest guidance on conservation areas and / or listed buildings.
Develop dedicated local skilled workforce
Offer Incentives.
DON'T BUILD ANY NEW HOMES UNTIL YOU HAVE THIS IN PLACE - avoid having to retrofit new builds!
Again see What Wiltshire Council can do - Appendix 1 page 21.

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?

I reiterate the disconnect between this document - Addressing Climate Change and Biodiversity Net Gain and the Local Plan and the need for these to be prioritised and placed at its heart. I do not think any planning and development should go ahead until

then as there is so little time left to save the planet. WC should publish clear targets on how they are going to improve air quality in Wiltshire and mitigate any rises inherent in future planning proposals and developments.

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?

WC need to show inspiring leadership by supporting the residents of Wiltshire to reduce demand, improve efficiency and take up low carbon solutions in relation to transport. For example, bring down emissions in transport by providing a modal shift to more sustainable models. It is good that future planning models will include cycleways and walkways but needs to go much further and be more ambitious. We still need incentives and investment to encourage more use of public transport and discourage car use by parking charges, e-cargo bikes schemes. Is this another good area for WC to be involved in a pathfinder project as we are such a rural county?

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?

I do not know enough about this area to comment, but suggest the Transport Department at WC can research this and collaborate with neighbouring and cross-tier local authorities as well as developing Green Finance to support the challenging transition. What are other areas of the country doing?

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?

I believe we have to put our horse before our cart and agree the zero carbon living targets before going ahead with the future planning of developments especially Future Chippenham Proposals.

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

Rep ID: Climate8	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Woodland Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes. Planning shapes the future – if strong policies do not respond to the climate crisis today, we will continue on a locked-in high-carbon trajectory for years to come, which we cannot afford.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Not our position to comment in full – but we highlight: 1.The importance of factoring in the role of natural carbon storage. Developments should achieve a net gain in natural carbon storage.	

2. Developments should ensure resilience to climate change through smart integration of green infrastructure including trees and woods.
3. Developments should not compromise the resilience of the natural environment in the context of a changing climate.
4. The importance of sustainably sourced timber in construction, to help support low-carbon developments and a sustainable forestry sector.

A3: How should these actions be delivered and measured?

1. We urge the council to consider how planning policy can increase natural carbon stores. We highlight the example from Cornwall, where the draft Climate Change DPD requires a net gain in the natural carbon of a development: Policy SC2 - Protecting Natural Carbon Storage: All major development proposals shall include a Carbon Storage Calculation showing the difference between the carbon storage capacities of the pre and post development habitat on the site. Any loss of carbon storage shall be compensated for with a carbon offsetting contribution towards natural climate schemes within the Local Nature Recovery Network or through a suitable carbon reduction technology.
2. Strong green infrastructure policies that require all developments to: integrate quality green infrastructure from the earliest stages to maximise multiple benefits; ensure green infrastructure is ecologically coherent from the site to the landscape scale; and make provision for long term maintenance.
3. Strong policies that ensures development does not impact on ecologically-rich sites, including irreplaceable habitats or the integrity of wider ecological networks that connect and sustain them. We highlight the importance of the Nature Recovery Network mapping in development by the Wiltshire Wildlife Trust, and the forthcoming requirement for Local Nature Recovery Strategies. Development should follow the mitigation hierarchy that ensures avoidance first of harm, and then quality delivery of biodiversity net gain.
4. The Climate Change Committee recommends a national target that 40% developments should have timber frames. The council might consider adopting a similar, or more ambitious, target. An example from South Somerset's Local Plan reads: '14:48: ... The procurement of locally grown timber products to the UK Woodland Assurance Standard (UKWAS) should be supported, in particular in relation to development, in order to achieve improved sustainability of construction and in support of local supply chains.'

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

- Assume typo in 'New built development should be located in Flood Zone 1' – new development should not be located in floods zones.
- It is much easier to incorporate SuDs in new development than in retrofit schemes – so we urge boldness around requiring SuDs (carefully defining 'where technically feasible' to ensure this requirement is not negotiated-out).
- We highlight the role of trees and woods in natural flood management, particularly at the catchment level. The council could consider a developer contribution to whole catchment management as well as on-site SuDs.

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?

- We welcome that GBI will be guided by the emerging GBI strategy, as a landscape-scale approach will maximise multiple benefits.
- Amend 3) to 'GBI should be accessible for all and should be design to maximise the benefits...'. We urge a policy to maximise rather than just consider various aspects of GBI.
- As above, strong policy should require developments to: integrate quality green infrastructure from the earliest stages to maximise multiple benefits; and ensure green infrastructure is ecologically coherent from the site to the landscape scale. We highlight the Building With Nature standard which provides a useful framework to consider the coherence of green infrastructure from a site to the landscape.
- We urge that every opportunity is taken to integrate high quality green infrastructure, which will further support carbon sequestration and resilience to the impacts of climate change (e.g. cooling, improved air quality and natural flood management), in, across and beyond schemes.
- We urge accessibility standards. The Coronavirus pandemic has highlighted the importance of access to nature for health and wellbeing, and start inequalities in access. Following the well understood benefits of woodland for wellbeing, we also highlight our Woodland Access Standard, which aspires that: no person should live more than 500m from at least one area of accessible

woodland of no less than 2ha in size; and there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes: <https://www.woodlandtrust.org.uk/media/1721/space-for-people-woodland-access.pdf>

- We urge Wiltshire to require above the minimum 10% Biodiversity Net Gain set by government – we recommend at least 20%. Early studies indicate that there are loopholes that can ultimately result in biodiversity loss in reality, so it is prudent to set a more ambitious rate (<https://www.wcl.org.uk/will-biodiversity-net-gain-improve-english-biodiversity-results-from-the-first-evaluation-of-net-gain,-and-whats-next.asp>). We highlight Swindon which requires 20% Biodiversity Net Gain in their Local Plan.

- We would like to see Wiltshire Council adopt a requirement that all new developments will achieve at least 30% canopy cover (see Emergency Tree Plan: <https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>).

- We highlight the emerging policy in Cornwall (Climate Change DPD Policy AG1) which requires Whole Estate/Farm Plans for rural developments, to assure that development proposals respond positively to the climate emergency and deliver multiple environment, social and economic benefits.

- Key additional policy areas should include:

- oClear protection of ancient woodland and veteran trees in line with NPPF para 175c. Our Planner's Manual for Ancient Woodland and Veteran Trees (<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>) might also be useful. When considering protection of trees and hedgerows, it is essential to consider the extent of root area to ensure that adequate buffers are provided. For ancient and veteran trees, we recommend a minimum of 15 times the diameter or 5 metres beyond the crown, whichever is greater.

- oThat new trees should be sourced & grown in the UK, or be sourced from nurseries with sound biosecurity measures, to help avoid the spread of disease;

- oThat new trees are ecologically appropriate to the site and support nature recovery aims, and a diversity of species are planted. Natural regeneration should be considered where appropriate.

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?

- As above, we highlight the importance of sustainably sourced timber in construction, to help support low-carbon developments and a sustainable forestry sector. The Climate Change Committee recommends a national target that 40% developments should have timber frames. The council might consider adopting a similar, or more ambitious, target. An example from South Somerset's

Local Plan reads: '14:48: ... The procurement of locally grown timber products to the UK Woodland Assurance Standard (UKWAS) should be supported, in particular in relation to development, in order to achieve improved sustainability of construction and in support of local supply chains.'

•We highlight the opportunity to systematically integrate above-ground green corridors with the installation of ground source heat pumps and new district heat networks.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

We would welcome policies to support renewable energy. It is important that such schemes are not sited to adversely impact on important ecology. We suggest wording such as: 'The proposal does not adversely impact on internationally, nationally and locally designated wildlife sites and the integrity of ecologically connectivity, does not damage irreplaceable habitats including ancient woodland and veteran trees, and delivers biodiversity net gain.'

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?

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?

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?

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?

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?

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

We welcome that responding to the climate emergency is central to the Local Plan. The climate emergency and ecological emergency are separate, but interrelated. Would like to see more acknowledgement of the significance of the ecological crisis we face and the importance of responding to the climate and ecological crises in an interrelated way. Throughout this document, the key framing is the climate crisis. There is no overall framing around ecological crisis.

P4 – ‘Setting the Scene’. This is all about climate. We urge that this section also clearly references the scale of the ecological crisis, and the importance of a local response in Wiltshire. Example references: IPBES Global Assessment 2019 (<https://ipbes.net/global-assessment>) which highlights that a million species at risk of extinction; the Planetary Boundaries framework (Stockholm Resilience Centre) (<https://www.stockholmresilience.org/research/planetary-boundaries/planetary->

boundaries/about-the-research/the-nine-planetary-boundaries.html) which clearly places climate as a boundary alongside other interrelated crises; the UK State of Nature 2019 report which highlights declines in 41% of UK species since 1970 (<https://nbn.org.uk/stateofnature2019/>). Our Emergency Tree Plan clearly sets the importance and role of trees in response to the climate and ecological crises: <https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan>

3.7 – We would expect a need to protect and restore the natural environment. Protection is important but not enough – we are starting from a much depleted baseline for nature. We would like to see similar focus group around the ecological crisis and integrated response with the climate emergency.

Rep ID: Climate9	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Chairman - Wiltshire Wildlife Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
This framing of the Local Plan still has an assumption that 'growth is necessary' whilst that remains the chances of reversing emission trends will be very challenging. Until Climate and Nature are given equal weight in the local plan process it will be very hard to prevent negative impact.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

By ensuring that appropriate contributions are made by those who financially benefit from development to allow Wiltshire Council to fully invest in strategic solutions for Nature and Climate mitigation. Site based solutions are important as well but they are often too disparate and not sustained in the medium to long term

A3: How should these actions be delivered and measured?

Setting clear and ambitious targets to improve the Natural Capital balance sheet of Wiltshire.

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

The proposals are still too site based and not catchment focussed enough. Without working from the catchment level in the cumulative impact of each development could lead to unintended consequences that cannot be reversed. Once developed land does not get returned to its natural state.

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?

Good in principle but too late to be considered with equal weight in the Local Plan review. We urgently need investment in Natural Capital baseline data. The policy also needs to identify who will lead the BNG delivery, where the priorities exist to deliver it and how it can be sustained beyond the 30 year commitment. There is no mention of Nature Recovery Networks which all developers should consider. By 2050 it's very likely that more growth will be promoted continuing to put pressure on the Natural Environment. Development is almost always one way and history shows that this is to the detriment of the environment and mostly for commercial benefit of a few developers and landowners. The site based approach of the Local Plan process divides and rules when it comes to the environment. Wiltshire Council is able to be a champion for the Environment, there are plenty of

well paid lobbyists and promoters for development because of the financial gains at stake its about time that this imbalance is recognised and remediated.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

The is far too much weight given to Carbon reduction and not enough to the Nature emergency and how to mitigate. All developments should be required to produce a Climate and Nature impact assessment and make clear commitments to the communities in which they are operating what investments they are making to mitigate this impact. There needs to be clear responsibility for delivering and maintaining mitigations not generous promises and then moving onto the next site. Developers should have a climate and nature 'star rating' based on their commitments to these.

Rep ID: Climate10	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Laverstock and Ford Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>From past evidence this seems unlikely, unfortunately, but you should certainly be making every effort. There will be two main factors governing future carbon emissions:</p> <ul style="list-style-type: none"> - Improvements in the carbon emissions associated with new vehicles, new buildings, white goods etc. - Individual behaviour such as car choice and usage, aviation usage, attitude to existing home insulation improvement and heating usage, etc. <p>From the former, Wiltshire Council can and must mandate building codes which require low carbon construction and zero carbon operation without delay. It has little control over the other aspects. Regarding the latter, improvements will be driven by a combination of persuasion and legislation. It would appear that WC can only address persuasion, with such things as better and greener public transport, provision of safe and enjoyable foot and cycle routes. Whether central government has the resolve or ability to enact effective legislation in a 2030 timescale is doubtful considering its past lack of resolve on such things as fuel duty.</p>	

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

Implement appropriate building codes.

- Mandate a move to electric buses and improve public transport
- Support green energy generation on roofs and on poor quality agricultural land
- Implement safe, usable and attractive cycle routes where it is clearly demonstrable there is a demand
- Ensure that all new homes have an allocated parking space with facility to easily install a dedicated and secure ev charging point linked to their home supply

A3: How should these actions be delivered and measured?

You are in the best place to judge how to deliver, but this delivery should be regularly audited using a pre-published audit framework and the results made public.

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

We would support all the points listed. Whether the future risks increase to the point where these are insufficient will depend on the success in limiting climate change.

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?

Yes, provided they are delivered BUT can we have any confidence in this. The GBI Strategy has been promised for years but is not yet delivered. It often seems that statements like “All new development will provide a minimum of 10% net biodiversity gain” are extremely difficult to measure and how will they be audited? Do WC have the capacity to ensure that these things are really delivered?

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?

The question is again not whether these go far enough but whether WC has the capacity to ensure delivery. Building codes should have been tightened years ago but were not, presumably due to pressure from house building companies. Evidence is that even these codes were often not fulfilled due to on site errors which there appears to be insufficient capacity in the building control department to identify and require resolution of.

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?

Presumably you have to have central government support to achieve this, since most house builders will be against it. If so, are you confident? If you can implement the building regulation requirement yourselves and ensure compliance then, yes, you should go all out for it.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Inevitably house builders will say that it will, but WC need to take the long view. It is clear that a relatively small increase in cost now will save much more in the long term (as well as the planet, hopefully)

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Not competent to comment

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Not able to comment on the approach, but whatever is done has to be a long term scheme which gives confidence of continuity for installation companies and gives protection to homeowners (and tax payers) from rogue and incompetent players and confidence that what is done will achieve the promised performance. There will be a need for information events and WC resources to provide impartial advice on types of schemes and qualifications of installers. Support for new businesses in the sector through loans/guarantees/advertising/etc.

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?

The general approach seems right but WC may need to get involved in the detail of new developments to ensure the most efficient rather than the cheapest systems are adopted. For instance, air source heat pumps will be preferred to ground source, but there may be noise issues if many are installed in a small area. Perhaps communal green space could be used for ground source systems or perhaps bore holes could be relatively cheaply installed if many are done together – in areas on chalk this should be relatively easy to achieve. The long term efficiency and hence economic/environmental advantage over air source pumps is clear. Similarly, integrated solar pv roof systems rather than add on panels have clear advantages, but WC may have to mandate the maximum possible generating area in a roof (you often see a nominal area of integrated panels covering a small fraction of the area) and modify site layouts to optimise pv output (which should give the best passive solar heating potential for the homes too).

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

See reply to B8 above

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?

WC should certainly set demanding targets for renewable energy generation in any new housing or commercial development. WC could also set a commercial renewable energy target, for instance from solar pv farms, but this will need to be carefully managed to guard against BMV agricultural land loss and significant visual impact in sensitive areas.

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?

Integrated solar pv tiles appear to be the only viable option. Some relaxation of listed building and conservation area rules will inevitably be needed to meet not only energy generation but also insulation targets.

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?

Unclear. However, future house design must recognise the need for and facilitate working from home to help minimise travel, across all types of housing.

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?

WC need to have clearly thought out plans for public and active transport development and make planning permissions contingent upon the builder delivering a part of that plan in the local area.

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?

This must form part of the forward planning but it is clear that central government must take the lead on this since it is a national problem. It is inevitable that all levels of the grid will need upgrading.

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?

Not competent to comment in detail, but it is an issue where central government need to take a lead in design standards and perhaps even low interest long term loans to cover any substantial extra cost. Excessive developer profit margins should not be allowed to compromise energy performance and future proofing when new buildings will hopefully be around for a hundred years or more

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



Rep ID: Climate11	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Chapmanslade Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The Local Plan is a step in the right direction, but there needs to be a fundamental update of the Town and Planning Act which sees a re-prioritisation that sets carbon reduction as the first priority from which all other aspects flow. Only then will the Local Plan be capable of making a viable impact. On reviewing the material submitted with this consultation it is a huge undertaking and the Local Plan alone cannot deliver all that is required.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Create local active travel facilities and infrastructure – Not just in large settlements but also between settlements. Active travel facilities should include existing built-up areas. Reduce spending on roads and discourage the casual use of cars as transport and revise the access for vehicles in residential areas. Support sustainable public transport. Make development of renewable generation facilities easier with consideration for local ecology. Support renewable energy updates to existing housing.

A3: How should these actions be delivered and measured?

Regular and frequent checks on main roads of air quality and particulate pollution. A 'joined up' strategy with Highways England and Wiltshire Highways for the direction of traffic to main arterial routes and away from roads that pass through residential areas. Reducing catchment areas for local schools. Providing incentives for car-sharing schemes, and the infrastructure for easier and safer use of bicycles and walking.

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

No. Additional effort has to be put forward to ensure the current existing developed areas are included in water management schemes and additional measures are required to create more natural flood management measures.

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?

No. While we wholeheartedly support the approach to GBI it appears to be focused on just new development which will cause conflicts with and issues when people from outside of a development come to enjoy the benefits. A whole community approach

that ensured the GBI extended well off site would ensure the GBI would connect different areas of the community and ensure a balanced responsibility for the areas.

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?

Yes. We are encouraged by the outlined plans and the inclusion of existing buildings but believe that all future work should be approved against scientifically agreed standards that reduce carbon. This needs to be done at a national level, and thus a full review of the Town and Planning Act, linking it with zero carbon aspirations is required.

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?

Yes. The construction industry has been well aware of the need for zero carbon building for many years and it is for them to make the changes required. Planning approval needs to be stricter in this respect and be driven by environmental, carbon-zero policy rather than market forces.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It shouldn't if there is clarity that zero carbon is a consideration in all planning approvals and that the zero carbon policy is strictly upheld. It will be down to developers to adapt to meet the planning requirements, and there is sufficient advancement in 'green' housing technology for them to do this. The benefit might also be an increase in the quality of housing for the future.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Current Building Regulations no longer fit the bill and a change is required in order to create a zero carbon building mentality. If this requires new legislation then that is what should happen, but any new legislation should include Planners, Ecologists, and the Building Industry in order to set SMART standards. Update the Town and Planning Act.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The Local Plan does not seem to fit all the requirements for this. An initial step might be to provide greater support for making existing homes including listed buildings and those in conservation areas more energy efficient. As existing buildings are in the majority this is a key step which will significantly improve the move towards zero carbon, whilst new homes are regulated to meet higher zero carbon standards.

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?

We are encouraged by the measures outlined and welcome the inclusion of existing buildings.

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

All technologies should be encouraged but careful consideration should continue to be given to SLAs and the natural environment. Tree planting should be encouraged. Agriculture should be reviewed and encouraged to reduce carbon and methane gases and re-cycle these into producing energy.

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?

Renewable energy is fundamental to reducing carbon and the basic aspirations of the Climate Action Plan. Thus, all future planning for houses, roads, agriculture and waste disposal need to start from a point of carbon reduction. Any proposal should therefore come with data showing the carbon output from a completed build and be measured against scientifically established targets that maximise carbon reduction.

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?

'Green' energy should be available and promoted through subsidies for all existing buildings. Listed buildings preserve the history of a building but this is often to the detriment of them requiring high energy usage for heat etc. The climate crisis is such that such considerations must now be reviewed and if better energy efficient solutions are available then these should be acceptable for all existing building types including listed buildings. Existing buildings make up the majority of houses in the county and to improve their energy efficiency will have a large impact on achieving carbon reduction.

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?

A comprehensive approach must be taken that looks at the overall impact of housing, roads and agriculture on our environment. A plan for the reduction of fossil fuelled heating in homes, waste disposal, and a review of the requirements from future agriculture are needed. Requirement for new roads must be reviewed to keep as much traffic as possible away from towns and villages, and an overall traffic review undertaken to reduce the environmental impact of road noise and particulate pollution.

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?

The council needs to explore and exploit the benefits of electric cycles, in particular the increased journey distance over conventional bicycles and the reduced effort required. This opens up opportunities for the council to take the lead in creating the infrastructure between settlements both large and small that in turn provide the self-containment of settlements as well as providing health and wellbeing benefits. Vehicle traffic should be restricted within settlements for access only, and emphasis placed on a network of active transport routes between existing and new settlements.

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?

In a low populated county with a large amount of agriculture, schemes to turn agricultural waste into energy should be investigated and promoted. Subsidised assistance for the self-generation of electricity (solar, ground source, wind etc.) to power homes and charge electric vehicles should be considered.

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?

Houses need to be built to higher energy standards. All housing proposals should have a comprehensive environmental and energy section as part of the planning process, and this should be firmly implemented by the Planning Authority. Every planning application should be measured against its carbon footprint.

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

Our overall view is that environmental/climate considerations should now become the starting point for all spatial planning considerations. There are more existing homes than new builds in Wilts so there should equally be a plan for those if Wilts is to fulfil its climate plan. Thus 'green' energy conversion needs to be a factor as a retrospective and subsidised planning consideration, as well as new robust standards for any future builds.

The spaces in between settlements need to be preserved and their own carbon footprint reduced, or in the case of some agriculture, 'captured' and turned into energy.

Housing planning cannot be disconnected from schemes to reduce vehicular traffic and thus carbon emissions. Thus, future and existing sites need a new infrastructure of connections that encourage active and sustainable transport such as cycling and walking, with vehicular traffic being increasingly reduced in its access to routes that pass through residential areas.

Rep ID: Climate12	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Westbury Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
We hope this will be the case, but I don't think we will actually know the answer to this question until the local plan is in operation and we start to see changes.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Transport seems to be the biggest problem, if we can start to reduce carbon emissions from transport we may see a change.	

A3: How should these actions be delivered and measured?

Unknown at this time

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

Until these plans are put into action the results are unknown, but we will have the chance to adjust the plan to it's best result

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?

The proof would be when it is put into action, the policy should be looked at again in about a year and adjust anything that needs changing to get the best results

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?

The policy seems in good shape, the proof will be in the results

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate13	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A1 is a carefully worded. The Local Plan cant 'significantly reverse existing emissions' but it has an important role to play nevertheless. It can avoid new development that is not sustainable. New development can also make settlements more sustainable overall, addressing some, but not all existing emissions.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Use new development to support delivery of transport infrastructure that serves both new and existing communities. Ensures that new development is designed to have low reliance on cars, located within 15 minute walk of the town centre with access to good bus or train service. AAA segregated cycle routes.

A3: How should these actions be delivered and measured?

- Allocating development sites only where strict criteria are met
- * No fossil fuel use in buildings. That means full electrification in many places.
 - * EV charging & secure cycle storage designed in to all new homes
 - * Biodiversity net gain with a nature recovery network embedded in the plan
 - * all development fully served by cycling infrastructure to LTN 1/20
 - * 15 minute walk to local amenities
 - * A high quality bus or train service within 15 minute cycle.

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

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?

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?

It doesn't go far enough. Energy strategy needs to demonstrate fabric first, and UKGBC provide a framework for addressing embodied emissions. 'seek to minimise embodied carbon' will not raise standards meaningfully alone. BREEAM Good should be a minimum requirement for all relevant schemes.

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?

It doesn't have to be zero carbon in 2023, but needs to be net zero ready - ie. highly insulated and with no fossil fuel heating. This is already being delivered at volume in the UK.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No. Designing in ASHP is not much more expensive. Much cheaper across whole life than retrofitting a HP in at a later date.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Require the National Homes Standard 2025 to be met from 2023, including no fossil fuel use. Homes are already built to higher standards in many places, like in Bristol.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Use the local plan review to begin defining areas for Growth, renewal and protection. Energy use and fabric efficiency should be a factor in identifying renewal areas - encouraging retrofit.

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?

Wiltshire needs to commission a renewable energy capacity study, which identifies area where solar and wind generation are most likely to be acceptable to the council. The plans should form part of the policy.

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

Technology agnostic.

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?

No.

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?

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?

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?

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?

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?

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



Rep ID: Climate14	
Consultee code: General Public	Consultee Organisation (if applicable): N/a
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Possibly not but there is no reason not to try. One reason is that existing housing allocations in the local plan and either under construction or having the benefit of planning permission are located in places with inadequate walking/cycling and public transport infrastructure which makes them car dependant and therefore exacerbating emissions from transport. They are also insufficiently stringently conditioned in relation to energy efficiency of the dwellings with a lack of renewables. This needs to change with policies requiring new development to be carbon neutral and use renewable energy, e.g. solar panels , ground source heat pumps, high standards of insulation , electric vehicle charging points</p> <p>There should be a complete embargo on building on floodplains even where this would be an extension to an existing enterprise. The large housing developments being constructed on the edge of towns as encouraged in the spatial strategy are car dependent and housing sites need to be more closely related to existing sources of employment infrastructure and transport links</p>	

. Ground source heat pumps need garden space , street trees mitigate air quality so we must accept lower overall housing densities on greenfield sites. (think garden city)

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

Set requirements for renewable energy on all developments. Preclude development on flood plains including extensions to existing properties. Require street tree planting on all new roads.
Improve walking and cycling routes through towns and cycle parking provision including proposals to widen pavements and provide a coordinated transport interchange. Link walking routes in towns to the rural rights of way network .

A3: How should these actions be delivered and measured?

Air quality measurement along all main roads with targets for reductions. Percentage achieved for each renewable energy measure on all new developments and set energy and insulation standards. Percentage of retrofit renewable energy measures (may be more difficult to measure). Set targets for mains drainage provision to reduce surface water flooding from infiltration of septic tanks from groundwater. Require grey water recycling in all new non domestic premises.

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

The local authority as drainage authority will need to be willing to accept responsibility for Maintenance of Suds . Currently there is a problem with responsibility for future maintenance of these systems which, if they fail, could cause downhill flooding. Highway specifications need to change to accept permeable surfaces which may require more maintenance. Where brownfield sites fall in higher flood risk areas , they should not be redeveloped but revert to nature. This will require financial incentives to achieve.

People will change low water fittings if they don't work properly . The financial incentive to use less water in domestic properties exists via water metering.

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?

I would add allowing derelict sites within flood risk areas and green corridors to revert to nature.

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?

Prefabrication is not the answer. Products may get damaged on site leading to future problems particularly with damp. We live in a wet climate. Mortgage lenders prefer traditional bricks and mortar so finance for nonconventional builds may be problematic. If standards are set out with sufficient clarity a Sustainability Statement should not be necessary but Enforcing compliance with standards is key and requires resources .

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?

It should be the aim but may not be achievable as the design of buildings may have to change significantly which may not be acceptable in certain locations such as conservation areas.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Construction will be more expensive initially resulting in lower residual land values . Landowners may prefer not to sell which could reduce the release of sites. It may affect viability on brownfield sites where there may be significant remediation costs.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

If building regulations are not sufficiently stringent, the local authority will have to set its own standards, which are clearly and unambiguously set out in the local plan.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Through grants for loft insulation, solar panels and heat pumps especially in areas of fuel poverty (often rural areas). Wall Insulation is more problematic as it can cause damp in buildings that were designed with ventilated cavity walls.

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?

Nothing to add.

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

It should encourage all proven technologies and invite innovation.

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?

All new development should incorporate renewable energy measures as has been set out above.

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?

Via grants which is possibly outside the scope of the local plan. These should not be tied to any particular technology as it is up to owners of existing buildings to work out what is the best solution for their particular circumstances.

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?

The strategy of concentrating development on the outskirts of major settlements has led to large car dependent housing estates and a decline in air quality on main routes .. This strategy needs a rethink with a more dispersed form of development more closely related to employment sites. However, people have freedom of choice and may still need to travel to work. Post COVID there may be a sustained increase in working from home which will reduce daily commuting. The school run needs to be addressed by encouraging walking and cycling to school by safe routes. New schools should be located where this can be achieved. Where distances are too great or there is no safe walking route free and reliable school transport needs to be provided to reduce the need to drive children to school. Without these measures Travel plans will have little effect.

Public transport needs to inter connect (buses serving the station forecourt, for example) and be cheaper with more flexible multimodal ticketing (outside the remit of the local plan though) .
The provision of multiple charging points for electric vehicles will reduce emissions.by facilitating their use.

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?

The council could provide on street charging facilities . Much of the older housing in towns has no off street parking. The private car offers flexibility (no need for timetables) privacy and freedom from infection by other people's germs and often a door to door service . It is therefore a desirable product and modal shift will only occur where the alternatives are pleasanter, cheaper, quicker and more convenient. For example, few people would drive from Wiltshire into central London as the train is quicker and it is expensive and difficult to park at the destination.Car use and car ownership are not the same thing. Reopening of closed stations (but with adequate car parking) could reduce the length of some car journeys and encourage train for leisure journeys.
A coherent network of Additional cycle routes (not within the carriageway) would encourage cycling which on many roads is perceived to be unsafe. Poor road maintenance is another deterrent to cycling

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?

I think this is a national issue . The council may wish to take this up with government via the MP

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?

Designs will need to change . Unless the way the property market functions changes , more expensive construction costs will reduce residual land values and this may impair the release of sites.. Volume housebuilders may diversify into other more profitable fields.

This again, is a national issue with wide ranging financial implications

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

There is only so much that can be achieved via the local planning process, but that is no reason not to try. The plan could specify housing space and quality standards - not just in terms of energy and green space but of quality of life, sound insulation, enough space to work from home to reduce travel , a high quality broadband infrastructure. An important issue is not to make matters worse by allocating sites for new development away from existing public transport and services.

Rep ID: Climate15	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

Areas of BNG should be protected and managed in perpetuity.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?
B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?
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?
B9: Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?
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?
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?

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?

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?

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?

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?

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

Any information relating to BNG seems to be at an absolute minimum in the policy information you have published despite the country being in a climate change and biodiversity crisis. I would have thought this would have featured more in the information published and I am interested to know what strategic projects and local nature recovery networks you have planned to achieve BNG off site. More detail on how you plan to protect and enhance biodiversity is required/would be welcomed.

Rep ID: Climate16	
Consultee code: Other	Consultee Organisation (if applicable): Salisbury & Wiltshire Swifts
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No Comment	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
No Comment	
A3: How should these actions be delivered and measured?	

No Comment

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

No Comment

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?

No. The statement 'All new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy' is an appalling starting point for a document which will remain current to 2036. Swindon Council (part of the county of Wiltshire) Policy DM 32 Biodiversity, amongst other good points, states at para 4 'All developments must secure a minimum of 20% measurable net gains for biodiversity or as set out in legislation, whichever is the greater.' The LPs of many LAs either already state 20% or are increasing to 20% net gain in biodiversity when being reviewed and it will be hugely damaging to Wiltshire's wildlife to fall behind the accepted way forward. It is good to have a figure, but it needs to be at least 20% in line with Swindon and other LAs if it has any chance of still being relevant in 2036. There is no logical reason why Wiltshire's safeguards for biodiversity should be any less than Swindon's. In Wiltshire Council's own response to the government White Paper the Council highlighted its concerns that 'streamlining the local plan process must not be at the expense of adverse impacts on the environment'. The White Paper makes huge assumptions about the depth of ecological knowledge which is held by various organisations across both the county and the country. Organisations with experience of the natural environment and ecology such as CPRE, Wildlife Trusts and RSPB are extremely concerned that the White Paper proposals are much in the favour of developments and will provide little or no protection to our countryside and wildlife. Therefore it is imperative that this draft of the Local Plan and/or supporting documentation contains the detail and means to ensure that the environment and wildlife of the county are protected.

There is no mention in the measures listed in Policy Theme 2 of the ecological importance of the built environment and the opportunity it presents to provide a net gain in biodiversity. Given the amount of development that is forecast to be undertaken this is a huge omission. The potential of the built environment to contribute to reduced carbon emissions, nature and wildlife and the health and wellbeing of the population must be recognised and addressed. Ecological enhancement measures can be conditioned in individual planning applications, but a much more consistent and reliable approach is for LA planning strategy/policy/guidance etc documents to spell out what ecological enhancements are required to ensure the built environment can sustain as much wildlife as possible. It makes practical sense to include low-cost ecological enhancement measures in all new development to provide at least a 20% gain in net biodiversity to compensate for the loss of both our brownfield and greenfield sites. Much is easily achievable by including such measures as bird, bat and bee bricks, hedgehog highways, ponds, hibernaculas, wildflowers, hedgerows, tree planting, green roofs, allotments and orchards etc etc, all of which also contribute to reduced carbon emissions.

The current Wiltshire BAP 2008 p130 recognises that the provision of bird and bat boxes provides an opportunity to enhance wildlife in the built environment and lists swifts as a 'priority species'. We understand that the BAPs are to be replaced by the government's 25 year Environment Plan which has yet to reach LAs. In the interim the detail contained in the local BAP is not being updated and we are concerned that it is not being referred to. If this is the case, then either the new LP must contain such detail or there must be Supplementary Planning Guides for building design and biodiversity written for implementation at the same time as the LP. See examples of wording of other LAs for both LPs and BAPs:

London Borough of Islington draft LP 2020-2035 G4 section 5.27 Pg 153 states: "Islington's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow, peregrine falcon and black redstart, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many of species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan, and in many cases, will include micro habitat creation. Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats."

Shropshire Council Regulation 18: Pre-Submission Draft Local Plan 2016 to 2038 August 2020:

Pg 91 7. Maximising opportunities to increase the quantity, quality and connectivity of natural assets in accordance with policies DP15, DP16, DP17 and DP23 through habitat creation and management measures, provision of appropriately designed and

suitably located bat and bird boxes or swift bricks and any other such measures which would support protected or priority species.

Cornwall Planning for Biodiversity Guide: Pg 11 - 5.1.5 Enhancement In order to deliver ecological enhancement across Cornwall all new residential developments are expected to provide either a bat or bird box/tube within the structure of the building at a rate of one box/ tube per unit. Consultant ecologists will be able to provide advice on how to group these within developments as it is likely that bat and bird boxes will be grouped on units closest to suitable habitat. For developments of two or more houses every other building needs to have a bee brick built in as well as the bat and bird boxes. At least 75% of bat and bird boxes must be provided built into the dwellings themselves as tree mounted boxes have a limited life span.

Wiltshire's Planning & Building Control guidance does recognise the 'potential damage of new developments' and gives examples of habitat enhancement and recognises that 'natural nest sites are quickly disappearing in most urban areas, contributing to a decline in bird and bat populations. Artificial nest boxes provide nesting and roosting sites for a wide range of birds and bats, including species under threat such as: house martins, swifts, swallows, house sparrows, peregrine falcons and bats'. It also gives examples of habitat enhancement 'Incorporating nest boxes into the fabric of a building ensures the longevity and safety of the box and minimises maintenance needs and visual impact'.

The British Standard Institute will be publishing a new standard 'BS 42021 Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes' late spring/early summer 2021 and this should be incorporated in the LP. This standard advocates the use of a 'universal' brick, which in essence is a swift brick but with an entrance hole of at least 30mm to allow for the red-listed starling. Studies at The Duchy of Cornwall sites are showing that swift/universal bricks are being used by the red-listed house sparrow and starling, and the amber listed swift, expected to be red listed at the next review. All three species are undergoing major decline caused by the loss of nesting sites on existing buildings due to re-roofing and replacement of soffits and fascias. Swifts, for example, have experienced a catastrophic decline of nearly 60% in the last 20 years. There is also photographic evidence of blue tits, great tits, nuthatches and even house martins using these bricks to nest making them a very cost-effective ecological enhancement measure for developers as one brick type will provide a nesting provision for variety of bird species. Bricks are easy to include in routine building practices resulting in an inexpensive biodiversity enhancer with the nest site confined within the brick with no access to the roof space. Integrated bricks are aesthetically pleasing, maintenance free, long lasting and less prone to predation and temperature variations.

The proposed Local Plan has not embraced central government's expectations:

National Planning Policy Framework (NPPF, 2019) Section 170(d) states "Planning policies and decisions should contribute to and enhance the natural and local environment by: ...minimising impacts on and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures..."

Section 174(b) states: "To protect and enhance biodiversity and geodiversity, plans should ...promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

NPPF, Natural Environment Guidance, paragraph 023, Reference ID: 8-023-20190721 How can biodiversity net gain be achieved? Provides further guidance stating "...relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat."

Government press release (21/07/19) James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication stated: "For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people." Thus, the Government's support for such measures was stated explicitly. Natural Environment and Rural Communities (NERC) Act 2006 Section 40 states: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

"Living With Beauty" (30/01/20) the Government's Building Better Building Beautiful Commission report recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110).

Examples of the level of nest box provision in new developments:

At least a 1:1 ratio of nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). The RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick.

A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity and The Royal Institute of British Architects (RIBA) in 2013.

The Duchy of Cornwall adopted the same principles in 2015, and a good example of the provision of a general type of integral box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay.

The Cornwall Council Biodiversity Guide (2018) gives prescriptive measures for the provision of bat and bird boxes, again at the rate of 1 nest place per new dwelling. This document also includes a case study on Nansledan mentioned above.

The Oxford City Council Technical Advice Note on Biodiversity gives an 'expected provision' of bird nest sites for building dependent birds (i.e. swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest boxes in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m² floor space.

Brighton & Hove City Council condition a minimum of 3 swift nest bricks or 2 per dwelling in all new developments that are five metres high or above and commercial developments will be required to have a minimum of 3 boxes, or one per 50m² of floor spaces.

Whilst we recognise that much of the above is too detailed to be included in the Local Plan, it provides the justification for a robust top-level statement to be included regarding the provision of ecological enhancements quoting examples and a net gain in biodiversity of at least 20%. If the LP cannot contain detail it must be supported by SPDs/BAP etc equivalents.

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?

Again there is a huge opportunity being missed. The LP must be robust enough (with detail if necessary in Supplementary Planning Documents) to ensure that developers include ecological enhancements sufficient to provide a 20% net gain in biodiversity. The built environment is ever growing and therefore it is increasingly important to encourage wildlife to thrive within it as it can also be a 'green and living' environment. The LP needs to include the wording necessary to ensure that not only ecological mitigation is undertaken for all development, but that ecological enhancement measures are also included. A net gain in biodiversity of at least 20% will go some way to redressing the balance of huge developments already built which have provided little or no gain in biodiversity. Adding small enhancements such a bird, bat and bee bricks, hedgehog highways, living walls and roofs, wildflower mixes and ponds to newly created built environments contributes to mitigating some of the negative effects of climate change as well as to contributing to health and wellbeing.

The British Standard Institute has new standard 'BS 42021 Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes' is due to be published late spring/early summer and therefore should be incorporated in the LP.

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?

No Comment

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No Comment

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The Government White Paper is a very dangerous document as far as protecting our green and brownfield spaces for nature and wildlife. It makes a massive assumption that there are comprehensive data already held on most parts of the country, which is just not true. The reality is there are random voluntary organisations holding various sets of data often submitted by volunteers with an interest in one particular species. The White Paper does not allow either the time or the resource to try and produce a comprehensive ecological map for each area. It will produce a 'static' set of rules over a set time period for a constantly changing environment, not allowing for the natural changes that will occur over the life of any Local Plan. See the response from Wiltshire Council to the White Paper:

"However, the need for robust environmental assessment cannot be avoided. Poor quality assessments will produce ill-conceived plans. There is no detail in the White Paper as to how the simplified process will continue to evaluate the likely significant effect of the plan on the environment and determine how adverse effects may be mitigated or where beneficial effects may be enhanced. Given the proposals in the White Paper to grant automatic outline planning permission in some cases, the strategic assessment of a Local Plan will be even more fundamental with the potential for less robust assessment at the development stage. Streamlining the local plan process must not be at the expense of adverse impacts on the environment."

Hence it is more important than ever that this version of the Local Plan does contain the detail and measures to ensure the protection of the Wiltshire environment and wildlife.

All new development should provide at least a 20% gain in net biodiversity much of which is achievable through small low cost enhancements such as bird, bat and bee bricks, hedgehog highways, ponds, hibernaculas, wild flowers, hedgerows, tree planting, green roofs, allotments etc etc, all of which also contribute to reduced carbon emissions.

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?

No Comment

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

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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

This document is headed 'Addressing Climate Change and Biodiversity Net Gain through the Local Plan'. Having read the document and then scanned through again there is little mention of biodiversity. The document is almost wholly about Climate Change with the odd mention of biodiversity thrown in.

There are no obvious questions on biodiversity and so we were forced to seek guidance as to where to input our comments on biodiversity issues. Even then there is only one question in the whole document that seeks input on biodiversity (Qu B2) and this was for some time published incorrectly in the consultation document (it was published as a repeat of B1). So, unless members of the public are persistent (and also read the actual questionnaires) they would not necessarily know there is an opportunity to comment on biodiversity.

If you are aiming to collect the views of the public on biodiversity for the county going forward this consultation paper is very poorly drafted and does not encourage the public to comment. The majority of the public do not have the knowledge/data/expertise to answer many of the questions, hence answers will often be guesses and will not generate a meaningful response. The overall language used in the document is also not aimed at the public whereas the 'Planning for (various towns/villages) consultations' were written in a 'friendly' language and style much more likely to engage the public.

Rep ID: Climate17	
Consultee code: General Public	Consultee Organisation (if applicable): Transcoco (Transition Community Corsham)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, Indeed, the proposed approach to development, particularly housing and roads, will significantly INCREASE the county's emissions, The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this.</p> <p>The Spatial Strategy section is driven by Government housing targets that use an out-dated formula from 2014 and includes an additional 5,000 houses on top of the 41,000 required by this formula. The structure and location of the proposed major housing developments will inevitably increase dependency on private cars, requiring further road developments and associated transport emissions. The Spatial Strategy and the Supporting Sustainability Assessment do not quantify any of these emission impacts. The Local Transport Plan section admits that its projection of future traffic volumes are based on out-dated assumptions and</p>	

totally ignores how climate change policies could affect traffic patterns. Although the Climate Change and Biodiversity Net Gain section makes some relevant points, these are not reflected in the Spatial Strategy or in specific policies elsewhere in the Plan.

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

The plan must include a calculation of the county's carbon footprint and contain year-on-year targets for how this will be reduced, All proposed developments must have their emissions impact quantified and the cumulative impact compared to these targets.

A3: How should these actions be delivered and measured?

1. Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets
2. Avoiding building houses where this creates car dependency and people will need to commute long distances to their work
3. Introducing planning policies that require housing and commercial development to be BUILT to zero carbon standards (to avoid costly retrofitting at a later date) and settlements to be designed such that they are genuinely sustainable, avoiding building on greenfield sites wherever possible
4. Reassessing major road schemes based on realistic projections of future traffic volumes, taking into account local and national climate change policies and longer-term changes in work patterns as a consequence of COVID-19.
5. Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan
6. Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and massively improving infrastructure for electric vehicles
7. Protecting and enhancing the carbon absorption properties of the natural environment (our natural capital and carbon sinks), including significant increases in tree planting. This will also contribute to biodiversity, (see also 3 above, the avoidance of building on greenfield sites)
8. Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security. This includes the Council's own county farms
9. Introducing planning policies that require climate change impact assessment of all proposed developments against the Council's carbon reduction targets.

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

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?

See previous response

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?

See previous response

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

See previous response

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

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?

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?

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?

See previous response

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?

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?

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?

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

Rep ID: Climate18	
Consultee code: General Public	Consultee Organisation (if applicable): Bath University
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

My comments within this email cover all aspects of the Local Plan consultation, but I would first like to add that it appears you have made this as burdensome and overwhelming as you possibly could so that as few people as possible even attempt to respond to your 'consultation'.

The Plan covers the period up to 2036, a period in which the world needs to take decisive action to reduce carbon emissions if we are to prevent catastrophic climate change. While this is a global issue, every part of society needs to act, with councils, like Wiltshire, having significant powers to influence carbon emissions in the county. The National Planning Policy Framework requires Local Plans to 'take a proactive approach to mitigating and adapting to climate change in line with the Climate Change Act', which requires the UK to achieve zero carbon by 2050 and reduce emissions by 68% by 2030. In 2019, the Council voted to reduce Wiltshire's carbon emissions to net zero by 2030.

Despite this democratic mandate and the legislative and planning framework, the proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, and indeed the proposed approach to development, particularly housing and roads, will significantly increase the county's emissions. The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this.

The Spatial Strategy section is driven by Government housing targets using an out-dated formula from 2014 and includes an additional 5,000 houses on top of the 41,000 required by this formula. The structure and location of the proposed major housing developments will inevitably increase dependency on private cars, requiring further road developments and associated transport emissions. The Spatial Strategy does not quantify any of these emission impacts, nor does the supporting Sustainability Assessment.

The Local Transport Plan section admits that its projections of future traffic volumes are based on out-dated assumptions, and fails even to mention how climate change policies could affect future traffic patterns.

The Climate Change and Biodiversity Net Gain section makes some relevant points, but these are not reflected in the Spatial Strategy or in specific policies elsewhere in the Plan.

I believe the Plan needs to include a calculation of the County's carbon footprint and contain year-on-year targets for how this will be reduced. All proposed developments must have their emissions impact quantified and the cumulative impact compared to these targets.

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets.
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment.
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible.

- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of Covid-19.
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan.
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles.
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon

Rep ID: Climate19	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Benchmark Development Planning Ltd
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate19
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?	
<p>This is a complex question and we believe that the climate change emergency will have to be addressed with radical new land use policies. However, we are answering the question here only in terms of proposed site and land use allocations.</p> <p>1) FORD FARM was submitted to Wiltshire Council in March 2020 as a separate self-contained strategic major proposal for South Wiltshire without encroaching upon or extending the villages of Ford and Laverstock. It is a proposal to deliver, with a developer, a mixed use sustainable and green development. Our template will be net zero carbon. It will assist in tackling climate change and also bring forward community participation on local energy generation and sharing.</p> <p>2) People will be able to live and work in one place to reduce the need for the private car. This excellent and innovative scheme has been designed by leading master planners.</p> <p>3) Our proposals are being submitted to Wiltshire Council to be included in their Local Plan Review to 2036. It is a ground-breaking paradigm proposal that seeks to address Wiltshire Council's objectives, that include:</p>	

- tackling the climate emergency;
- delivering sustainable mixed use development; and,
- building homes of a design, tenure and size that are not only much needed but would lead the way forward in terms of energy efficiency.

4) We expect Ford Farm to deliver up to 600 homes over several phases, with employment land and buildings (up to 5 ha), self and custom build and community facilities to include recreational facilities and a Heritage Park, over the next 10 to 15 years.

5) There will be a community hub including a farm shop partly sourced with healthy home-grown crops from our proposed vertical farm buildings. Power and heat will come from an Anaerobic Digestion Plant together with other renewable energy sources, fuelled by crops grown on the surrounding fields, resulting in a fully integrated carbon zero infrastructure. The new Ford Farm will enable a much more sustainable way to live and work whilst building on the existing excellent connections to Salisbury, and also nearby Porton Down and Boscombe Down centres of international excellence.

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

Assess and then allocate Ford Farm.

A3: How should these actions be delivered and measured?

Assess and then allocate Ford Farm and then measure its performance

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

Assess and then allocate Ford Farm. Step in the right direction.

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?

Assess and then allocate Ford Farm. Step in the right direction.

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?

Assess and then allocate Ford Farm. Step in the right direction.

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?

Assess and then allocate Ford Farm. Step in the right direction.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Assess and then allocate Ford Farm. Step in the right direction. Viability is hugely complex for schemes that would emerge 2024 – 2036, as technology, knowledge, the law and implementation advances.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Complex question – to be answered in due course.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Complex question – to be answered in due course.

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?

Complex question – to be answered in due course.

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

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

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?

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

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?

No comment

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?

No comment

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?

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

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?

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

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?

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

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

Complex question – to be answered in due course – but see also the Ford Farm Opportunity Framework (Feb 2021). [Climate19]

Rep ID: Climate20

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Westbury town council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

P9 are the charts mislabelled both say transport. The right-hand chart has completely wrong - numbering. The local plan could achieve some of this if

- 1) Resisting applications for sites (such as Millbrook and Sandhole Lane in Westbury) which are predicated on the use of cars; instead of engender connectivity by walking, cycling, public transport and other sustainable methods. Location with respect to services is key.
- 2) Takes far more notice of issues around flooding and water run off-dealing with water on site.
- 3) Consideration should ALWAYS be given to water runoff to avoid flooding. Semi-permeable membrane should always be used where possible.
- 4) Reverse Wiltshire's current policy on wind turbines.

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

Energy efficient houses

Solar panels / photovoltaic tiles on every roof

Gas/oil heating should not be used

Houses should be built with charging points for electric vehicles and appropriate standing positions for charging

Advances of ongoing techniques in building also need to be included

Ground source heat pumps should be considered for inclusion at build as this is simpler during construction

All new builds could be built with triple glazing, better for noise reduction and condensation.

Footpaths/ cycle paths and any system that removes the use of the car.

Road systems need to be fully integrated so that cycle paths are included as standard.

The car should not have precedence and better more regular public transport should be standard.

A3: How should these actions be delivered and measured?

Delivered: see above for options

Measured: Wiltshire Council should publish and measure costs on modern as against older houses. This would mean that everyone could see the attainable savings.

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

We don't think so. We think the following would help.

A ford over the Biss at Old Dilton, during heavy rainfall as the Biss is so long, there is much flooding.

The density of housing in areas subject to flooding. Low density building in flood risk areas should be considered. One house next to a river is fine, one hundred and fifty houses is quite different. The interspersing of areas of green space and the use of semi-permeable hard standing will make a difference.

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?

A 10% biodiversity gain lacks ambition.

A larger target on site by reducing housing density would improve the environment, help with flooding issues and make for more attractive and desirable homes.

This would also improve health and wellbeing.

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?

Weak' words like seek and support should not be in the policy as they are unquantifiable.

Replace 'seeking' and 'support' with actual requirements.

The level of such requirements should be set to increase over the life of the plan.

Ineffective words like should and could must not be in the policy.

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?

This is achievable, there are examples available in all building fields and there has to be a will do it.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No because strong concerted action by authorities like Wiltshire Council would ensure that the market develops the economy of scale on zero carbon products and techniques.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

If the Planning White Paper contains a blueprint to gain zero carbon efficiency then that should be followed. Wiltshire Council should aim to be a beacon authority in achieving zero carbon nationally.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Make grants to homeowners but any scheme should balance improvement against 'perfection'.
Historic houses should have an allowance made for improvements but accept that they may never reach ideal standards.
Small grants can make real changes.
Landlords should be encouraged to improve properties, in addition to grants landlords and business owners could also be offered council tax reductions.

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?

No, the measures are not sufficiently ambitious.
Take out restrictive policies in the core strategy.
Open up the local plan to include and take advantage of new technology.

Storage technologies and techniques automatically required within houses/ estates.
Alternative green fuels such as hydrogen I nitrogen should be considered.
Connection points for walkers and cyclists to other forms of public transport.
Children and parents should be incentivised with reward schemes for walking or cycling to school. These could be distance related, the further you walk the more 'tokens' you get. A Wiltshire walking lottery?

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

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?

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?

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?

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?

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?

More sustainable generation with storage technologies.

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?

We are all currently paying for doing nothing. Viability is a zero-sum gain. Everyone must join in or it won't work.

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

Rep ID: Climate21

Consultee code: Other

Consultee Organisation (if applicable): Cranborne Chase AONB

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Given the well-documented negative effects of artificial light at night (ALAN), especially bright white (aka "blue rich") LED light, on the biodiversity of birds (<https://www.darksky.org/light-pollution-poses-threat-to-migrating-birds/>), mammals (<https://academic.oup.com/jmammal/article/96/2/438/903088>), and especially insects (<https://www.sciencedirect.com/science/article/abs/pii/S0006320719307797?via%3Dihub>), I am surprised that it is omitted from this paper.

At the very least, especially given the International Dark Sky Reserve (IDSR) status of the Cranborne Chase AONB and Wiltshire Council's expressed "strong support" for the establishment of the IDSR, I wish to see policies to mitigate the effects of ALAN on biodiversity by requiring fully shielded exterior lighting with a maximum colour temperature of 3000K (but 2700K preferred).

Rep ID: Climate22	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No Volume of new developments outweighs (real up to date) demand. Plans for roads will lead to an increase in vehicles not a decrease. Quality (from a carbon reduction perspective) of developments is too low and lacks ambition. Inclusion of developments which will increase carbon emissions is unacceptable.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Restart the plan with meaningful targets which are founded in carbon emissions reductions FIRST and 'so called' demand SECOND. Endless drive towards 'jobs and growth' is not sustainable. Alter public perception to QUALITY of life to move away from endless consumption.

A3: How should these actions be delivered and measured?

Science based targets for every single aspect. The data is not the issue. Delivery should be in COLLABORATION with local communities with time based targets. Annual CO2 reductions are a MUST.

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

All of this is aspirational and entirely lacks substance. The word 'should' is in every single line. The word 'must' or better 'will' is absent, which is entirely reflective of the lack of real ambition in this plan. The previous page mentioned 'measurable' which 'should' is not.

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?

As per previous answer

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?

Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

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?

No - the ambition falls far short.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

What does 'would a move to support' mean? Either the council demands/stipulates/requires every new development to be zero carbon or not. Please use the language of today and not a decade ago.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The strictest, toughest commensurate with the size of the catastrophe of the Climate Crisis.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Grants.

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?

Promote renewable energy generation, including targets and making onshore wind generation (the lowest cost form of electricity generation), which is not currently in the Plan

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

Solar and onshore wind. Definitely NOT nuclear.

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?

Yes - a minimum of 10% year on year incremental increase to 70% by 2025. Action now will make it easier later.

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?

Grants. Publicity. Requirement. (carrot and stick)

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?

Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;

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?

Empower communities - connect communities in transport hubs - tax 2nd cars per household - add low emissions charge to town centres for traditional cars. Get people out of cars, including eVs.

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?

Pressure them. The technology already exists, there are hundreds of electricians now graduating. This excuse is old and SSE/SSEN is well qualified to ramp up now. (Pers., comm.)

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?

It would improve design and weed out the wheat from the chaff - bring it on please!

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

Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

Rep ID: Climate23	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
It is imperative that the Local Plan is rewritten to introduce policy that results in year on year reductions in carbon emissions. These policies need to be voted and passed in 2021 in order to deliver the Councils democratic and legislative obligations, even if they surpass and overturn Government edict regarding carbon emissions.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Bring forward the new low carbon build standards for all new builds as at now/asap,. Work with Local bus companies to enhance public transport to all estates and villages to enable reduction of car parking for new builds. Work with SSE to get the Grid ready for introduction of much more renewable energy. Identify and allocate space for a solar park.

A3: How should these actions be delivered and measured?

By working with the appropriate agencies/local govt and developers and by reporting back quarterly to suitable local organisations, i.e Wiltshire Climate Alliance and Salisbury Transition City

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

Very pleased with all the above for new builds. If any can be retrofitted, householders in [LOCATION REDACTED] are having problems after heavy rain with drain back-up. Ensure sewers and drains are enhanced downhill of substantial new builds

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?

They would certainly be a good start, augmented with wildlife friendly hedges and trees where possibly, the A36 ring-road and roundabouts. All plantings should be chosen for their wildlife value above anything else other than safety.

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?

Yes, very good but but a further suggestion to improve would be that all car standings, front gardens should be semi permeable

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?

And earlier if possible. Apparently some councils have overridden Govt standards by bringing the standards forward. Make it so!

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No, Developers should be called out if they try this on. We've been sitting on the evidence for 30 years, they should have work-arounds by now

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

All development whether new build housing or commercial should be built to zero carbon standards in suitable and sustainable lots, avoiding greenfield sites wherever possible. If possible Developers should be encouraged to relinquish bids and set-asides for lots that could be used for small business market gardening or rewilding

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Council architect/ planning permission to the best standards, overseeing appropriate "green" trades. I would like for the Council to have a firm hand on this process and be well informed of the best standards and practice for "green retrofit". This would help

small companies and self build organisations, land trusts etc to flourish under guidance. Also where necessary to constrain developers.

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?

Yes, be very firm with detractors. Assist householders with finding reliable contractors for their retrofits. Extend the Green Deal. Work with the Grid Owner with upgrading the grid in anticipation of solar or on-shire wind power generation

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

I think there is room for solar, bio, ground source and wind. Nuclear (not even small reactors) should not be considered, they are not truly renewables, and they are not flexible enough. Lets not subsidise the nuclear program

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?

Yes, we must have a target or we will never start. 20% of Grid Sector Load by 2026 and 50% by 2030 . Can SSE advise for Elect. SSE have mentioned grid modification. The windier weather should be utilised. Also hydrogen gas tech and the other new technologies

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?

Engage green technology consultants to advise of solutions most sensitive to the building.

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?

The number of freight and logistic delivery vehicles on the A360 Devizes Road and the A36 Wilton, Ring and Southampton Roads needs to be addressed. The A360 Devizes Road and A36 Wilton Road are residential roads, and very narrow in places. The air quality can be very bad, The noise pollution also. Walking is unpleasant in these areas

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?

Anywhere there is a significant parking area could host 1 or more charging points. Churches, doctors surgeries, camp sites, sports clubs, supermarkets, trading parks, and park and rides are obvious choices. Work with COGS to map out cycle routes that avoid narrow high intensity roads, and publicise the results, Work with bus companies to expand services at commuting and shift change times, all routes. Also no village village should be without a regular and appropriate bus service

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?

The Council should ascertain the spare capacity of the Grid and start work within that. Work with the DNO/DSO to commission a staged process of upgrades to the Wiltshire area Grid and continue to work within that. The Grid is having to be upgraded for all the new house builds surely. I'm assuming that the problem might be spikes of requirement. Survey electric car drivers to discover when and where they charge, and how that might be affected if there were more places.

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?

Petrol Stations will eventually become electric charging areas and other services (post offices, information points, lay-bys with facilities. The Gas producers and suppliers will eventually (hopefully quite quickly) become producers and suppliers of bio-gas and methane/hydrogen. Heating Engineers are already reskilling in the installation of the new technologies including heat pumps. There might be different safety constraints about the supply and operation of the gas appliances in domestic situations

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

1. Reassess road schemes based on realistic projections of future traffic volumes, as a consequence of COVID-19.
2. Recognise on-shore wind generation which is the lowest cost of electricity generation and NOT CURRENTLY MENTIONED in the Local Plan.
3. Protect, all natural capital, and agricultural land and facilitate hedge and tree planting to improve biodiversity
4. Require a climate change impact assessment of all proposed developments in advance against the Councils's carbon reduction targets

Rep ID: Climate24

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I write to express my dismay at the Wiltshire Council 10 Year Local Plan. At a time when the county, the nation and the world are facing the significant threat of climate change the WC plan for the future is woefully unsuitable to address the problems we face as a result of rising carbon emissions. In all the significant areas of activity the Council has oversight of, the Plan fails to provide any real answers for how the county is to become carbon neutral by 2030; the Council's declared aim.

The Local Plan deals with subjects such as energy use, energy production, transport, housing, road building and the Westbury Incinerator. In all these areas the Council fails to provide any leadership or creativity in finding meaningful ways to reach carbon neutrality before the end of the decade. Indeed, many of its proposals will actually increase the county's carbon emissions over the next nine years. This plan is not fit for purpose and is not in keeping with the Council's own position when it signed up to recognising a Climate Emergency, which it did in 2019.

In supporting the Wiltshire Climate Alliance stance on the Council's 10 Year Local Plan I would like to propose the Council accept the following observations and take the subsequent suggested actions:

Despite this democratic mandate and the legislative and planning framework, the proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, and indeed the proposed approach to development, particularly housing and roads, will significantly increase the county's emissions. The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this.

The Spatial Strategy section is driven by Government housing targets using an out-dated formula from 2014 and includes an additional 5,000 houses on top of the 41,000 required by this formula. The structure and location of the proposed major housing developments will inevitably increase dependency on private cars, requiring further road developments and associated transport emissions. The Spatial Strategy does not quantify any of these emission impacts, nor does the supporting Sustainability Assessment. The Local Transport Plan section admits that its projections of future traffic volumes are based on out-dated assumptions, and fails even to mention how climate change policies could affect future traffic patterns. The Climate Change and Biodiversity Net Gain section makes some relevant points but these are not reflected in the Spatial Strategy or in specific policies elsewhere in the Plan.

We believe the Plan needs to include a calculation of the County's carbon footprint and contain year-on-year targets for how this will be reduced. All proposed developments must have their emissions impact quantified and the cumulative impact compared to these targets.

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;

- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

This Local Plan is the best, and last, chance for Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations. I believe that the current proposals for the Local Plan must be completely rewritten on this basis.

On a personal level I would like to say that the position we are all in is extremely worrying and only radical and innovative measures will give us any chance of seeing Wiltshire achieve a carbon neutral status by 2030. This is the time to act and I hope the Council will revise its Local Plan in order to provide the necessary actions so desperately required of it for the sake of the planet and our children.

Rep ID: Climate25	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
As Parliament and the Council have acknowledged, we are in a climate and ecological emergency. In that context the Local Plan absolutely MUST deliver radical greenhouse gas emissions reductions. If the proposals for new development are considered in the light of the current emergency, then it is reasonable to assume that the Local Plan can deliver outcomes that significantly reduce existing carbon emissions. Unfortunately, the plan as it stands now will significantly increase emissions, so needs to be reworked.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

No new development should be permitted that is anything less than net zero both in terms of embodied and lifetime operational carbon. Any new development must include measures that drawdown any carbon emissions that cannot be avoided in its construction and operation. New development should not be permitted on land that currently performs as a carbon sink, e.g. greenfield sites. No development should be permitted that necessitates out commuting.

A3: How should these actions be delivered and measured?

Development that is needed to address the shortage of homes must be constructed where those homes are actually needed. This may be out of county, in which case cooperation with authorities that really need the additional homes must take place. A county carbon budget needs to be established such that the impact of any proposals can be measured against that budget. The budget must be finite and reflect the reality of the carbon reduction task. A date for net zero is meaningless - the key is remaining within the carbon budget.

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

This section of the Local Plan correctly identifies, using the reference to the response to Covid-19, that urgent action to tackle emergencies is possible. It also acknowledges that it is important not to lose sight of plans to tackle the ongoing threat of climate change. It states that the Council is preparing strategies aimed at delivering synergistic step-changes towards tackling climate change. It notes that dramatically reducing the amount of carbon released in Wiltshire needs to focus on emissions from cars and the energy used to heat and power homes and businesses. Considering we are in a climate and ecological emergency, it is very disappointing that it seems that any meaningful action on achieving radical GHG emissions reductions is being pushed back until after a more detailed policy response to climate change is developed, following this consultation on the Local Plan.

Decarbonisation targets have not yet been set because a carbon baseline and budget have not yet been calculated.

It is encouraging to see that this section of the plan does acknowledge some of the key issues that must be factored into any decision-making about the location and form of any new development, e.g. the need for big changes to travel patterns to significantly reduce carbon emissions. As this section highlights, sustainable development means increasing self-containment within settlements, aligning job creation with housing, reducing the need to travel, supporting modal shift and using greener vehicle technology.

This section correctly identifies that policies in recent decades have 'potentially' not gone far enough to adapt to and mitigate the acknowledged effects of climate change. In reality, there is no 'potentially' here. Key policy decisions, such as the jettisoning of the proposed zero carbon homes regulations due to enter force in 2016, by the Conservative Government, illustrate the point,

and the problems this has caused Local Authorities when trying to do the right thing in terms of sustainable design and construction are acknowledged in this section of the plan. I argue that this does not preclude the Council from insisting on future development conforming to standards that are in line with their emissions reduction targets.

The problems are identified - tackling unsustainable travel patterns/modes and decarbonising existing and future building stock. It also understands the important role of the Local Plan in influencing the achievement of these goals by shaping the pattern and form of future development, supporting the delivery of renewable energy schemes, encouraging investment in the green economy and influencing the shift to sustainable modes of transport. However, this has not yet translated across to the rest of the Local Plan, which in its current form works against the radical decarbonisation necessary to achieve the targets.

Section 4 also acknowledges that current policies potentially do not incorporate the opportunities to enhance green/blue infrastructure and biodiversity, and that the co-benefits of GBI in terms of carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement need to be explored. Again, a clear translation of these ambitions does not yet appear in other parts of the Local Plan, and this omission must be addressed.

The section emphasises that climate change adaptation and mitigation strategies must be woven into a number of planning policy areas and act as a 'golden thread' through the Local Plan. This is not yet evident. There is no specific linkage through the plan and its discussion of new homes, with mitigation or adaptation strategies. This MUST be addressed if the Local Plan is to have a positive rather than a negative impact on emissions reductions and the achievement of net zero targets.

Section 4 notes that assessment is now required to understand the extent to which current policies contribute to tackling climate change, and where the gaps are. It states that this assessment will support the scope for updating policy, developing new policies or whether a whole new climate change objective is required. This is an URGENT piece of work, and would seem to be fundamental to the decision-making about any future development, and whether or how it can proceed.

This section also illuminates the challenge of being behind the curve when it comes to the inevitable changes in the energy market, noting that developments could be potentially unviable as the existing infrastructure may well be incapable of meeting projected demand. This is an alarm call from within the Local Plan documentation itself, the implications of which need to be urgently addressed prior to any new developments being approved. This supports the absolute need for any new developments to be constructed so as to minimise energy demand and maximise energy efficiency and on-site renewable generation.

The section indicates that cooperation with neighbouring authorities is being considered, and could be important in supporting efforts to decarbonise at a strategic scale. However, it does not indicate that any such cooperation has actually started yet.

The section sets out in broad terms the areas that need addressing in order to achieve net zero (section 3), however, these measures have not translated across to the other parts of the plan - there is an almost complete disconnect between the climate change section and the rest of the Local Plan.

The section appears to indicate that Wiltshire has not yet identified a carbon baseline. It acknowledges that this is the necessary first step for a carbon budget for the county to be set, against which progress can be measured.

It is disappointing that despite acknowledging we are in a climate emergency, 2 whole years on from then, the Council still hasn't even established a carbon baseline.

This section of the plan (section 4) acknowledges that an adequate monitoring framework will be important to ensure effectiveness of policy, and that the current issue of a lack of a carbon baseline and time-series data on sector emissions is hampering efforts at understanding the scale of the challenge. This **MUST** be addressed as a matter of urgency, before any decisions are made that will make the task even harder to achieve.

Rep ID: Climate26	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Wessex Water
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

Wessex Water support the use of sustainable drainage systems (SuDS) to manage flood risk, sewer flooding and improve water quality and provide biodiversity and amenity benefits. To be effective SuDS schemes should include satisfactory arrangements for maintenance. The Policy Theme identifies the provision of a support scheme to retrofit SuDS in existing developments, such a scheme could also include rehabilitating existing SuDS which are in place but which are not delivering all benefits because of lack of maintenance.

We would welcome policy support to reduce surface water connections to foul and combined sewers. The redevelopment of brownfield sites can offer opportunities for surface water separation which can ease existing sewer flooding problems and free up capacity within the foul network. Developments should avoid creating additional burden on existing surface water infrastructure to reduce the level of storm overflow operation.

The section does not outline the proposed approach to addressing groundwater flooding, this should be clarified with reference to the Groundwater Management Strategy.

The plan should support statutory infrastructure providers to achieve targets to achieve net zero carbon through policy support for control at source options, therefore we support the requirement for new development to limit daily consumption and disposal of water. To deliver on this aspiration the plan should identify the requirements it expects developments to meet.

The section does not identify an objective to protect water supplies. Development should be planned and located so that it does not impact upon Source Protection Zones surrounding our sources or reduce the amount of water that can be extracted from sources.

We would suggest additional wording as water quality and supply issues often cross local authority/neighbourhood boundaries and are best considered on a catchment basis:

Development proposals should be subject to liaison between the local planning authority, the Environment Agency, catchment partnerships and water and sewerage companies at an early stage to identify water supply and quality issues, the need for new water and wastewater infrastructure to fully account for proposed growth and other relevant issues such as flood risk. The duty to cooperate across boundaries applies to water supply and quality issues.

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?

The policy theme identifies that the approach will be guided by the emerging GBI strategy and ideally we would have liked to have had the strategy available ahead of the plan consultation to inform our response. We support the aspiration to enhance and create new GBI assets to act as a critical aspect of natural flood resilience. As such we welcome the proposal to include a reference to blue infrastructure which is absent from the current policy. In addition, we support measures to ensure that surface water flood risk is reduced or removed where possible through policies in the Local Plan and the planning approval process for new developments. Nature based solutions include the use of wetlands as an alternative to more traditional energy and chemical reliant water treatment processes.

The consultation document doesn't give many details of how biodiversity net gain will be delivered in Wiltshire and therefore it is difficult to provide comment on this aspect.

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?

The policy theme identifies that ALL new development should be designed to achieve net zero carbon standards with this being achieved through the fabric of the buildings, plot orientation and renewable energy regeneration. We would like to see the policy incorporate greater flexibility for infrastructure development. Where we construct buildings to house plant and treatment processes these by their nature need to be functional and secure. As such we may be restricted in our choice of building materials. For buildings housing equipment cooling may be more of a consideration than heat retention. The position and orientation of buildings on site will be informed by operational considerations and size constraints.

The policy theme identifies the role that onsite renewable generation can play in reducing carbon during occupation phases. Wessex Water use installations using small scale renewables (typically small wind turbines or solar panels, at a microgeneration scale) to power telemetry and MCC (motor control centre) equipment supporting water supply and waste water infrastructure. Our infrastructure can be in rural locations and/or in sensitive landscapes. Support from the local plan would be beneficial to ensure that planning consent can be gained for such installations which if located appropriately, would have minimal impact on sensitive landscapes/heritage designations.

The policy theme identifies that where practicable support should be given to decarbonising and modifying existing buildings. The policy theme should offer parallel support for modifying existing buildings to reduce water use. Support at a local level to reduce levels of surface water connected to foul or combined sewers would also help to address the impacts around heavier rainfall events leading to increased surface water runoff into sewers (thereby causing increased operation of our Storm Overflows) and the impact of river flows on biodiversity.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Please note assessment method such as BREEAM are typically designed to evaluate standard building types with performance assessed in terms of improvements over the minimum established in Building Regulations. As such they may not be suitable for buildings which house plant and infrastructure. Therefore, there needs to be adequate flexibility in the policy approach to incorporate exemptions for infrastructure developments.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

As above under B3 this element of the policy theme should incorporate measures to reduce water use as well as carbon emissions.

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 see comments above under B3 regarding the need for policy support for small scale renewables in rural/landscape sensitive areas.

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

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?

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?

Wessex Water have some experience in working with Local Planning Authorities and AONB officers to deliver microgeneration schemes on existing buildings within sensitive locations. We would be willing to provide examples of successful schemes to help inform the policy approach if required.

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?

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?

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?

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?

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

As noted under B2 the consultation document doesn't give details of how biodiversity net gain will be delivered in Wiltshire and therefore it is difficult to provide comment on this aspect.

Rep ID: Climate27	
Consultee code: General Public	Consultee Organisation (if applicable): personal
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>We are moving to electric vehicles make this easier. the new ideas coming forward are suggesting that vehicles could be corralled and called up when required. New building should be designed to make better use of land, more properties on a given area and cars parked up else where ready for sharing. With Covid it is more likely that non residential buildings could be converted and offices could eb used by many companies rather than one. More sites could be reused and time limits could eb put on this proposal. That is once identified as convertible the site should be given a time frame for completion. Failure would result in forfeiture. This would apply to Wiltshire Council propeties too!</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

More encouragement to recycle. Much bigger waste tips and ones that are easy to access and longer opening hours. More joined up thinking. Some countries encourage their residents to keep their own space tidy and clear of debris and pavements clear. In rural areas boundaries with roads need defining and the owners must make sure that the highway is not full of debris

A3: How should these actions be delivered and measured?

Probably a lot more counting and joined up thought about how people behave in a certain situation. Benefits need to be obvious and preferably making use of the way a situation like Covid 19 can be handled to encourage desired behaviour.

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

We have a rainwater harvesting system and in New Zealand whole towns are reliant on rainwater. There is no other option. It is easier to put these systems in when building. There should be absolutely no building in or near flood zones. With global warming there is no flood resilient design that will withstand the test of time.

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?

this may be the beginning but it needs careful monitoring managing Climate change will be an expensive business

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?

Sustainability standards are a good idea but they need some teeth otherwise they can be avoided by large organisations. They certainly need to be more ambitious than the present ones which aren't even as good as past ones. Heating: Passive house ideals should do away with heating systems and then if necessary infra red could be installed for those with special needs. All the above should be part of the planning process and failure to reach these standards should no planning granted.

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?

Yes the technology is there and has been for some time. cost is the problem but good design can mitigate a lot of the cost.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

I am sure it would be problem, but modular housing is rising in popularity and many units come on the back of a lorry. It rather depends on the profit that is to be made on each unit. Time to stand up and say that the health and wellbeing of the population is more important to the success of this country especially as it is likely that we will be probably spending more time working from home now.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Current building regs have been watered down. we only have to look at the current schemes that have fallen foul of the authorities and cost lives in fires just to take one example. We are in the 21st century now of course they need upgrading

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This is abit technical , but quicker planning permission and having an advisor who can assist builders and owners to access the the new tecnologies on offer

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?

Nadder Community energy our local energy company have worked hard on this process and are looking to provide schemes that can be retro fitted. Firms with Large roofs should be encouraged to fit solar panels perhaps by buying in bulk.

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

You cannot tell what will happen in the future, so it is sensible to work with all new ideas. Innovation is rolling forward all the time. We have just installed a solar boost on our solar panels and from our we are saving money.

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?

If you have targets people need to meet them, they do need to be reasonable.

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?

Farm buildings are perfect for solar panels. They are large and quite unattractive but there for a reason, so panels would be very useful. Good insulation can help bring homes into the 21st. century but it is unlikely that they will be vry close to zero carbon

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?

In Tisbury we are tackling this problem with our rural electric car project just launched. There are now 4 charging points in the village. Charging points in towns need to be accessible and monitored and either free or available on a credit card not tied to companies. needs sorting.

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?

Read the new planning advice from the government and think about trees and car sharing. easier to implement new ideas on new projects. Don't let developers land bank or divide sites up to evade new rules

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?

In rural area there are lots of large roofs and fewer people so that should work out OK. In towns the same applies on industrial estates.

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?

It should enable innovation. We are pretty good at thinking out of the box when we have to.

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

I am constantly saddened by the fact that people have to be forced to do what is right for the planet. It would be great to have some role models who actually can provide a template for a contented life that doesn't damage the environment and provides freedom. I worry that the tech giants, who have the money and consequently the power, will lock us up in our homes and just deliver things to our door and say we are happy. We need to be able to think of lots of different ways of pulling ourselves out of the abyss.

Rep ID: Climate28	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The Transport Review assigns a low priority to Highway Schemes, with a high priority to active travel and a medium priority to Public transport schemes (Transport Review App A). Yet the amounts assigned to each are £31.7 million to Active Travel, £10.5 million to public transport and over £300 million to road schemes. The carbon impacts of these schemes are unquantified and this reflects a flawed and outdated approach to transport and land use planning. On the above basis I would say No to this question</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

There needs to be a change from the conventional approach of providing new road capacity to meet predicted changes in travel demand. Planning should maximise the potential for local living, ensuring services are readily accessible by walking and cycling. Road building should be minimised. Green standards for house building must be brought forward

A3: How should these actions be delivered and measured?

Residual travel demand should be shifted from private vehicles to active, public and shared forms of transport. Access and parking restrictions for private vehicles will help to create liveable streets and ensure that sustainable modes are always the most convenient and affordable choice. The railway schemes which WC has supported in SWLEP's 'Swindon and Wiltshire Rail Study, Rail Strategy Report' [July 2019] should also be supported in the Local Plan – this included new stations at Devizes Parkway, Wilton and Porton (subject to results of study) as well as service improvements. Bus route use from the villages should be improved by timely upgrades and inclusions for commuters shift workers and shoppers.

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

As a consequence of Salisbury's terrain with new development at the tops of hills, there are already regular occasions that heavy winter rains are compromising residential drains further down the hill. There may have to be building regulations about private and business driveways and hard standings to strictly limit the use of non -permeable horizontal surfaces. Working with farmers to reinstate hedges with native trees would also help

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?

Regarding new developments, the gain should be minimum 10% and should be onsite only, for these are the features that enhance personal wellbeing, biodiversity, flood management air quality, pollution and noise reduction and local carbon reduction. These are factors that should not be compromised by offsets.

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?

I'm not sure. I believe you need a Wiltshire Council Architect department (devolved to settlements and areas) with the powers to override proposals or parts of proposals that fail to meet declared principles, practices and targets. All specifications should be very tight and targeted to carbon reduction and biodiversity. We, your clients would welcome advice regarding the best local contractors and engineers to advise and supply "green" retrofits.

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?

I believe all proposals and bids from now on, for development commencing in 2023 should attend to the zero carbon targets and be rejected if they do not comply. Even 2023 is too late. it would be better to delay any builds not started and have the developers rebid to the new zero-carbon standards

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

My understanding is that architects are highly qualified professionals who have the experience and flexibility of thought to quantify any changes. It may cost you extra to implement change at short notice but once it's done it's done. What is it compared to having a thousand homes built to a poorer standard.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Implement the standards with the lowest carbon /preferably zero carbon penalty

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The Green Homes Grant is somewhat confusing. Finding local contractors is problematic for many house-owners, with memories of being "ripped off" by double glazing salesmen. Many of us have 5-10 year old gas boilers or concerns about whether the roof needs renewing before installing solar. I think if the Council would provide or at least recommend consultancy on the Green Homes Grant changes, that would help speed things along.

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?

At the present time I understand that there are no viable solutions to utilise Salisbury's abundant water flow to generate electricity.
However the ever increasing WIND throughout Wiltshire could and should be harnessed if sites could be obtained.

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

I URGE Wiltshire Council NOT to go down the Nuclear generation route, which is slow to install and bring on grid, detrimental to true renewable zero carbon options, is inflexible in operation and even slower to decommission.

It's inflexibility necessitates the turning off of Wind turbines at times of low demand, whose companies need to be compensated financially through utilities bills.

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?

Yes, but I have no idea what targets

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?

The most sensitive and least intrusive option

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?

Control the sources of Air Pollution, by normal non-electric vehicular traffic, freight and delivery vehicle emissions, domestic bonfires, agricultural processes (chemical additions and stubble clearing) and wildfires as much as possible by regulation, diversion and penalty.

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?

Encourage church, school, hospital, supermarket, petrol station, club and park&ride owners to install charging points (they might possibly get an income as some private owners are already doing this)

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?

Work together to understand the issues and make a plan. Include as item in the bids now

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?

There would be adaption, innovation, less reliance on car infrastructure, less concrete, more socialising. More healthy happy streets with less noise intrusion and pollution

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

Rep ID: Climate29	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>1. Unless the recommendations made by this climate change and biodiversity strategy are integrated within land-use policies I can only see carbon emissions increasing up to 2030. It is important that the whole Council is committed to meeting these targets or is otherwise honest that it cannot achieve them.</p> <p>2. New builds need to be scrutinised properly to assess whether they really are near to areas of employment and whether they are accretive to carbon emissions and disallowed if developers cannot deliver net-zero emissions.</p> <p>3. The existing built environment needs to be more of a focus for repurposing and adaptation to reduce existing emissions.</p>	

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

1. Funding needs to be diverted away from road schemes to grants to help people transition to electric vehicles - infrastructure - and carbon-free transport modes such as electric trams for cities, electric buses, more railway halts.
2. Something to stimulate adaptation of the existing built environment such as funding to help install alternatives to gas and oil heating such as ground source heat pumps is needed.
3. Businesses and homes need to be better equipped with technology that allows secure, efficient home working to reduce the need for travel. Although this has been accepted during the pandemic the right technology is needed to deliver better internet connectivity and network speed to ensure productivity when working from home.

A3: How should these actions be delivered and measured?

1. A set of overarching standards and measures or tests to achieve carbon reduction could be put in place for each proposed policy. If the policy fails to meet carbon reduction targets it loses funding and that funding is diverted to one that does.
2. Supply contracts should be publicly tendered nationally and compensation should be related to meeting strict targets on carbon emissions in contracts.
3. Existing suppliers need to be reviewed for their competence in delivering to the new standards.

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

This all sounds like a good start to me. I am no expert in this field but my house does back onto the River Wylye and we have had a significant reduction in groundwater from flooding since the river management measures were undertaken a few years ago. River management is key too I think.

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?

Yes, these all sound very positive, again I am not an expert but a focus on this, and increasing public awareness of how to look after their local assets through education would be helpful.

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?

Yes this all makes sense and is vital to making any progress. Not sure what the issue is with actioning it.

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?

Sadly I doubt that there is sufficient knowledge, capacity or time to achieve net-zero by 2030 but I am not an expert.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I would suggest pursuing any standard that helps to reduce carbon emissions and improve energy efficiency while maintaining safety standards.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

With public funding through means-tested grants and information.

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?

Yes these are all constructive. The main area to add is how to bring people along with you. Good public awareness and education are essential to driving change. This particular consultation process only reached those already in the know for instance.

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

All new carbon-burning technologies should be disallowed and any technology that can provide green technology should be considered in place of those, such as incinerators.

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?

Yes absolutely. But only if realistic. I do not have data to provide a suggestion.

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?

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?

Electric Vehicles are not the panacea they appear to be. The suitability, affordability and disposal footprint of new electric vehicles needs to be considered since batteries are harmful to the environment. Definitely need to reduce the need to travel where possible and encouraging public transport use by reducing costs and extending the networks.

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?

Close work with industry and transport providers is needed to help with communications and drive demand. There needs to be standardisation of charging connectors across the automotive industry to make this more cost effective and reliable for the consumer.

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?

Close co-operation and planning with the car manufacturing industry, as well as the distribution network operators, will be essential so that these aren't implemented before demand is there.

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?

Innovation is needed and there needs to be the will to look outside usual supply circles to find new partners.

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

Overall it is critical that one united approach that is effective in reducing carbon emissions and protecting our environment responsibly is taken forward. If targets need to be reviewed do so with good data and make realistic projections that are supported by central government and that can be implemented by suppliers with the right credentials.

Rep ID: Climate30

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

My comments relate to the Plan's lack of specific measures to reduce Wiltshire's carbon emissions now and in the future in order to avert the consequences of climate change. This is an overriding issue globally, nationally and locally, enshrined in National Planning Policy Framework and the Council's declaration of a climate emergency. Reducing carbon emissions should underpin the Local Plan as climate change has an impact on social, human, environmental, economic and political life.

Targets for reducing Wiltshire's carbon emissions should be included in the Plan. The proposals for housing and roads would bring about an increase. The impact of all proposed developments on carbon emissions should be calculated. Policies contained in Wiltshire's Report from the Global Warming and Climate Emergency Task Group and The Climate Change and Biodiversity Net Gain section of the Plan should be reflected in the Spatial Strategy and the Plan as a whole.

Specific measures to reduce emissions include the following:

- Avoid planning new housing where this creates car dependency.
- New housing and commercial/industrial development should be built to zero carbon standards and be sustainable, if possible, avoiding green field sites.
- Pay particular attention to integrated transport schemes to encourage a shift away from use of private cars towards public transport and safe walking and cycling. Investment in infrastructure for the latter and for electric vehicles is essential.
- Promote renewable energy generation, especially wind power. Improve energy efficiency.
- Protect the natural environment. Increase tree planting and improve biodiversity.
- Protect good agricultural land and encourage local food production.
- Be aware of ecosystems and the interdependent links between human and natural environments.

Wiltshire's Local Plan is an opportunity to work towards a sustainable future and to enhance life in this beautiful part of the world.

Rep ID: Climate31

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I would like to register my objection to the Local plan on several grounds.

Housing is being proposed on several green sites where there are brown sites that have been identified as alternatives. Green sites are becoming more precious as we go further into the climate and ecological emergency we are currently facing. Wiltshire's plan does nothing to address this issue. Where is the policy that demands zero carbon housing?

Our road building schemes need urgent reassessing as we are living in a different world now post pandemic, we need to reduce cars not increase them. Where are the cycle lane plans?

The only building we should be doing is creating wind farms, this is not mentioned at all.

We should also be increasing our green areas, helping with biodiversity to protect the future of our planet and future generations.

Rep ID: Climate32	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Not if Wiltshire CC plans to force through 7500 houses and an associated road outside Chippenham, which will completely break its own Carbon Neutral targets.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Build on brown field sites. Densify the town – in the post COVID world there will be spare offices to convert to housing in city and town centres. Install more solar panels on roofs facing south. Install more bore holes. Insulate existing housing stock.	

A3: How should these actions be delivered and measured?

Start by not building houses and a road on green fields. Grants will facilitate take up, or long-term ultra-low interest loans.
Measure: 75% of existing housing stock properly insulated to current new-build levels by 2030.

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

Retain the fields around towns to act as the water sink and slow down water release into the rivers. Certainly DO NOT build on the land which will accelerate water release into the rivers.

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?

You need an expert to research this. I have no idea.

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?

They have to. We are facing serious climate change issues otherwise.

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?

Regulations will drive whether we achieve zero-carbon levels. And adhering to them. Wiltshire County Council proposing to break its own carbon-zero targets by building 7500 houses and an associated road is not really convincing the electorate that our own council is on board with this. Roll on the election.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not if done professionally by experts who know what they are doing. However, the wording of this questionnaire does not reassure me that experts have been consulted in this.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I have no opinion on this - this is a question for an expert in the topic, not the public.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Existing houses should have more insulation to bring them in line current regulations, and solar panels should be installed on the roofs facing south. If appropriate, bore holes for a ground source/air source heating. It is obvious we need to modernise existing buildings and houses - they form the bulk of our housing stock.

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?

Moving to passive houses is very hard. But we should be moving in that direction.

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

Encourage all technologies to provide green energy in Wiltshire

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?

Yes. Increase renewable electricity generation 20 fold. Massively accelerate improved insulation of existing UK homes, focusing on homes of the less privileged first. Electrify the transport system and move town centres towards becoming walking/cycling towns.

Increase the area of woodland in Wiltshire to match typical European levels

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?

Solar panels on the roofs where the houses face south. If appropriate, bore holes for a ground source/air source heating. Even a stately home can install a bore hole in a yard.

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?

In addition: electrify the transport system and move town centres towards becoming walking/cycling towns. Increase the area of woodland in Wiltshire to match typical European levels to capture carbon and pollution.

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?

Better transport system to outlying villages. An electric busette to drive in a constant loop every 20 minutes so that it is worth waiting for a bus. Pedestrianise town centres. Install charging points in all car parks and parking spaces.

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?

Being in the south of England, we are well placed to benefit from solar energy. Put more solar panels onto roofs of houses and buildings facing south. We can also install bore holes and ground source/air source heating, and reverse their cycle in summer to bank heat from hot summer days.

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?

I don't actually understand this question.

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

Read Chris Goodall's book 'What we need to do now for a zero carbon society'. He sets it all out for you. Just follow his instructions. For now, we need to ASSUME climate change and prepare to cope with increased flooding and strange weather events.

Rep ID: Climate33	
Consultee code: General Public	Consultee Organisation (if applicable): individual
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Perhaps not reverse no but it should at least aim to halt the increase and get policies in place for a reversal going forwards.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19; Developing a planning framework that promotes renewable energy generation, including making specific provision for the lowest cost form of electricity generation, onshore wind generation. Encouraging a significant shift away from private cars to public and active transport,	

investing in cycling and walking infrastructure and improving infrastructure for electric vehicles. Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity; Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms. Encouraging regenerative agriculture systems like no till methods and mob grazing. Divesting council pension funds from environmentally damaging ones to that invest in fossil fuels to ethical investments.

A3: How should these actions be delivered and measured?

The sustainability framework needs to feed through into all council areas and be central to it's core thinking and decision making, not just be an afterthought. Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.
Pre Covid assumptions are no longer relevant, regarding work travel etc. It is worth looking at all major road development schemes and checking if they are still needed. (Though traffic calming measures could discourage crazy commuter driving). Money saved here could be used to improve cycleways and other forms of public transport. It would be easy to measure carbon emissions.

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

The above ideas are a really positive start. There are flood plain areas which should be earmarked NEVER to be built on in any circumstances.

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?

yes

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?

the above measures are very positive but the cynic in me wonders how watered down it will become and how much would actually be enforced. If it is only advisory then it is not worth the paper it is written on. The phrase 'not put at risk the viability of development' rings alarm bells as environmental schemes are often thrown out because they aren't economically viable. We need to stop thinking of the environment as a free resource. If development cannot be sustainable then it should not happen at all.

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?

Yes it is up to developers to get up to speed on sustainable development. If not then they do not have to go ahead. We should be encouraging those companies that can embrace sustainable development and not making excuses for those that don't want to change. There could be tax incentives for those managing to achieve this to offset extra costs (though that may well be something for national government)

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

see above

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I am not familiar enough with this to comment

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It is my understanding that it is not easy or cost effective to retrofit things such as ground source heat pump. Where measures are easy and inexpensive it is worth doing but otherwise better to concentrate on getting all new builds as green as possible.

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?

Why is onshore wind generation (the lowest cost form of electricity generation) not mentioned anywhere here? Also Divesting council pension funds from environmentally damaging ones that invest in fossil fuels to ethical investments would be a good start.

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

It should encourage the most cost effective options. Onshore wind generation needs to be looked into. Where it is sited the land can still be used for farming. This and solar and other systems could be great combined with the advent of better battery storage technology.

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?

You can set targets but I'm not sure how you can get individuals to make these changes unless the government brings in incentives/taxes. You can be the change you want to see though. Does the council use a green energy supplier? This in itself could be a massive transfer from a polluting sector to a renewable one?

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?

Not something I know about I'm afraid though solar is constantly developing, solar tiles that you dont even notice solar glass, so maybe this is a way forward?

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?

Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19; Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;

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?

dont know

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?

Look into microgeneration for smaller areas rather than being reliant on the national grid?

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?

Some schemes may not be viable but we need a reset in our thinking where if it is not viable for the planet then it shouldn't be viable for us. The donut economics model, finding the safe sustainable space.

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

Rep ID: Climate34	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The Local Plan at the moment does not include any significant policies to reduce carbon emissions in Wiltshire. Therefore, at the moment Wiltshire will not meet its targets before 2030. The Plan needs to include the right policies and they need to be implemented really quickly, then I think that the Plan can have a massive impact on carbon emissions before 2030 but time is running out! This particular Plan is so important as we only have until 2030 to act to avoid the worst impacts of climate change. Action needs to be taken NOW.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

New homes/ non-residential buildings – only build new developments where actually required by local people with local jobs, rather than being driven by out of date targets. Houses/buildings to be built as zero carbon to start off with, it costs 10 times as much to retrospectively make homes carbon neutral as it does if they are built that way initially. Ideas such as no longer connecting to gas, use of renewable energy sources, solar panels to generate electricity, heat pumps instead of more traditional boilers, use of low carbon materials which are also recyclable at the end of their life, insulation, more energy efficient builds, electric car charging points, close links to cycleways and public transport. Avoid building on greenfield sites.

Existing homes/buildings - offer loans/grants to make existing homes more energy efficient, work with specialist companies providing green solutions to offer cheaper solutions to individuals in exchange for contracts with the Council.

Transport – avoid building where the only transport option is the car, encourage the use of public transport and active transport, eg walking and cycling. Public transport needs to be a lot cheaper, even subsidised, widely available and more frequent. It needs to be changed so that it is more cost effective and easier to get the bus than to drive your car, otherwise people will just go with the most convenient option. More investment is required in cycling and walking routes so that routes are fit for purpose (eg pot holes are filled in) and are made safer (eg reducing maximum speed limits) and/or they are perceived as safe (eg cycling courses aimed at building confidence on the roads). Also, promoting Car share schemes eg electric car clubs or sharing cars on existing journeys with Car Share Wiltshire. Too often I sit at the bus stop and watch car after car go past with only one occupant. Car sharing not only alleviates congestion and pollution but it reduces fuel use. Improve infrastructure to make electric car use easier.

Reassess major road schemes - use realistic traffic projections, destroying the countryside to build a new road encouraging car use is not going to reduce carbon emissions. It is better to work on encouraging use of public and active transport.

Tree planting/biodiversity – significant increase in tree planting in existing parks and woodlands and working with local community groups to achieve this eg Avon Needs Trees. Often this would cost the Council nothing, as organisations such as the Woodland Trust provide trees for free and local community groups can plant them.

Renewable energy generation - provide grants for projects and set up onshore wind farms.

Agricultural land - protect farm and land use which encourages local food production, farms sustainably and organically and manages the land to encourage wildlife.

Waste/recycling - encourage higher rates of recycling, introduce kerbside food waste collections.

Reduce bureaucracy - the Local Plan needs to be updated and implemented quickly and bureaucracy cut otherwise however good the Local Plan is, it will just not be actioned in time.

A3: How should these actions be delivered and measured?

The Plan needs to include calculations of Wiltshire's current carbon emissions with detailed per year targets for specific areas eg transport, housing, etc. Then each year these need to be reviewed against the targets and action taken where necessary if targets are not being met.

New homes/buildings - the Plan should specify exactly what is required from developers to build zero carbon homes. This then needs to be monitored by the Council's planners when they sign off the plans and checks need to be made to ensure that developers are actually complying with these plans and that buildings are actually zero carbon.

Transport – investment is required in public and active transport, sometimes it is just a question of promotion ie I have only ever seen Car Share Wiltshire mentioned once, several years after I moved to Wiltshire. Suggested fuel contributions for it are really cheap and I'm sure a lot of people would be interested, if they only knew about it.

Increases in bus and car share use would be easily measured by bus companies and statistics from the car share website.

Existing homes/buildings - offer loans/grants to make existing homes more energy efficient, work with specialist companies providing green solutions to offer cheaper solutions to individuals in exchange for contracts with the Council. Companies can provide estimates of carbon savings.

Tree planting - targets can be set for how many trees are planted each year and targets can be reviewed annually.

Waste/recycling - set up a County-wide commercial waste contract with a particular waste provider, as Bath BID has done, so that businesses are encouraged to recycle because recycling is cheaper for businesses than getting rid of general waste. Many individuals do not recycle/reuse because identifying recyclable items eg certain plastics is often very difficult or they are unaware of websites such as Freecycle. Introducing a reuse/recycling hotline so that you can easily access information with a quick phone call would be ideal. The hotline could monitor the number of items then reused/recycled as a result.

Actions to combat climate change need to form part of all aspects of life, both individual and at Council policy level.

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

I do not have enough knowledge of this subject to be able to answer this question. All I would say is that developers are mainly interested in profits and therefore do not appear to be concerned with water management after a development has been built. For example, Katherine Park Field in the Katherine Park development in Corsham has terrible drainage. Even when it has rained

minimally the field is left water logged and unusable. Providing clear policies to developers with regard to water management, and then enforcing them, can only be a good thing.

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?

No, it would obviously be better not to build new developments in the first place. Certainly in Corsham recent new developments have destroyed beautiful fields and trees, meaning less wildlife and less natural environment to enjoy. Where development has to take place, the above measures are important but planting a few trees or incorporating a badly drained grassy area is not enough. Keeping existing pockets of woodland or fields, for example, would be beneficial for health and wellbeing, carbon sequestration and biodiversity. Actively reducing car use on the development would help air quality. Less intensive building, enabling more pockets of greenery would help too.

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?

Yes, I think that this would have a significant impact on reducing carbon emissions but the above need to form specific, clear policies to developers which they are obliged to follow. Again, these policies need to be implemented very quickly and rigorously enforced if they are to have the required effect by 2030.

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?

I think this all depends on how quickly the Plan is finalised and implemented. It might be achievable if the Council actively liaises with developers in advance so that they are aware in advance what might be changing as this would involve major changes to the materials they use and probably the way they need to work.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It might, as certain materials would be more expensive, eg heat pumps are quite expensive compared to traditional boilers.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I think that the Council should aim to implement the Government's new Future Homes Standard.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

By way of grants to individuals and companies, and by agreeing large scale contracts with companies that can carry out this work so that the cost to those who require retrofitting and modernisation of their buildings is reduced.

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?

No, a proper planning framework needs to be set up to promote renewable energy generation making specific provision for onshore wind farms which generate the lowest cost form of electricity. Residents of existing buildings should also be encouraged to change to green energy tariffs, which is something that everyone can do, relatively quickly, and which at this time are often cheaper than non-green tariffs. Could the Council liaise with a green energy provider and offer a cashback incentive to residents who switch?

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

The Council should promote and encourage all forms of green energy in Wiltshire however, as above it should also make specific provision for onshore wind farms.

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?

Targets should be set as percentages of total use, and reviewed annually. The target for use of renewable energy should be 100% as even if a resident does not have solar panels, etc themselves they should be able to change to a green energy tariff at little or no additional cost.

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?

Grants to encourage use of solar panels and heat pumps, etc in existing buildings. Provision of specialists who can individually assess Listed Buildings and those in Conservation Areas to advise what energy improvements can be made in each case.

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?

No, reducing speed limits to 20mph in urban areas would also contribute to a decrease in air pollution. Vehicle free areas in town centres would also help as would the active promotion of car share groups and car clubs.

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?

Public transport - needs to be much cheaper and more frequent to encourage people to ditch the car, investment required in new routes and subsidies on fares. Car share groups would reduce the number of cars on the road but this needs to be better promoted. Also, could the Council liaise with large well known local employers to encourage them to set up car shares in their work places.

Active transport - investment required in cycleways and pathways to make routes safer eg filling in potholes. Many people (including myself) do not cycle on the roads as they perceive a danger from other traffic on the roads so investment in cycling courses which build confidence in this area would be hugely beneficial. Provision of more bike racks in the community.

Green vehicles - still viewed by many as very expensive, could the Council provide loans or grants especially to electric car clubs?

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?

Have a variable pricing structure during the day and night, so that it is cheaper to charge the car at less busy times. Thereby evening out use.

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?

Initially this might be expensive for developers as new materials and new equipment would be required and initial building plans might take longer/be more expensive but once all of these become more widely used the price should fall. Certain developments might become too expensive and might not be viable initially.

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

My main comment would be that as a public consultation this is probably the most confusing, difficult one that I have come across. It almost seems designed to put the public off providing their comments. There is too much information, in different places, it is not clear, online responses cannot be saved ie you have to complete it in one sitting or alternatively you need at least a basic knowledge of Word to be able to fill in the Word form. It is also time consuming as I have spent half the day on only the climate change part. It is more aimed at people who work for the Council or have a professional knowledge of these topics than a layman or the average Wiltshire resident.

To be aimed at the public, it needs to be a lot clearer, a lot simpler, questions need to be more straightforward and there need to be less of them. It also needs to be aimed at people with a spare hour, not several hours!

Rep ID: Climate35	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes it is reasonable if people are informed that their lifestyles must change.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
For example, as transport emits 40% of greenhouse gases it is vital that ALL town centres become traffic free zones to encourage walking and cycling as well as the use of electric buses. Imagine a county known fro its clean air in town centres and a fitter and healthier population.	

A3: How should these actions be delivered and measured?

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

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?

No. Net gain of 10% biodiversity in developments is way too low. If one aims for 10% then 5% might be the actual reality and with climate change affecting loss of biodiversity we need to aim much higher at 20-30% net gain.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Subsidise solar panels and / or reduce rates for companies or households who install ground/air source heat pumps, improving thermal insulation, replacing windows, etc.

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?

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

All technologies which suit the site and are proven to be viable. This should also be more important than considerations of trying to keep old buildings looking old e.g. Salisbury cathedral allowing solar panels is the right way forward.

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?

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?

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?

ALL town centres must be pedestrian and bicycles only with electric buses.

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?

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?

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?

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

Rep ID: Climate36

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

Not if you decide to build more houses on the old golf course. There is nowhere near enough existing highways network that would support all the traffic to take building supplies in and it's likely to contaminate the river - keeping this green space would do more to support a greener future

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

reduce traffic where possible and keep as many biodiverse places as is reasonable - the old golf course has become just this during lockdown and will continue to support the introduction of wild meadows and flowers enabling the insect population to flourish again

A3: How should these actions be delivered and measured?

Don't build on green spaces with little existing infrastructure, go more out of town

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

it would be a good start but more still needs to be done

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?

no they don't you need to go further and enhance the great green spaces we have

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?

no not really

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?

not sure

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

yes maybe

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

please don't build on the old golf course

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

no

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?

not sure

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

yes

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?

not too sure

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?

not sure

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?

stop building houses where you need to expand and make more roads and the existing ones wider

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?

not too sure

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?

not sure

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?

stop building more houses

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

Please keep the green space down by the river - it's beautiful and has become such a haven for wildlife

Rep ID: Climate37

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

Although the land use plan clearly shows that there will be a lot of planting of new trees and biodiverse areas, it has been proven multiple times that 'carbon offsetting' is ineffective and should not be used to meet 'net zero' goals. This doesn't mean that tree planting shouldn't happen but it should not be counted towards the aims looking to reverse existing carbon emissions. Also, the existing plan does not show sufficient creativity and bravery in embedding climate change deeply into the planning framework. It is clear that housing is needed in the area, and building houses is never carbon neutral, but instead primary measures need to be built into the construction process and build to ensure the houses quickly become net zero and secondary measures need putting into place to ensure that the 'cost' of the build process can also be quickly mitigated. Suggestions are included for Q8.

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

The plan needs to include detailed primary measures that discuss the build process and construction of the houses. Some suggestions that I have considered are as below (but I encourage you to be brave and creative here too):

Design:

- * Houses should be constructed aiming for 'passive house' standards with the highest standards of insulation etc.
- * Houses should be constructed with microgeneration solutions such as solar PV, ground source and air source heat pumps built in - this is much easier to do at build time instead of retrofit.
- * Houses should have electric car charging points.
- * Flats and other houses etc should include plenty of secure, sheltered cycle storage (many new estates don't include anywhere to store a bike for people in flats).

Construction:

- * Construction should use a zero-waste strategy. I have worked on building sites and I know how much waste there is - it *must* stop.
- * Deliveries should be optimised to ensure that minimal visits are needed dropping off complete lorry loads instead of lorries dropping off odd bits and pieces. This will also minimise disruption to neighbours.

Secondary Measures:

- * Although the plan discusses local walking and cycling facilities - all of Wiltshire towns need massive investment in walking and cycling facilities. Instead of just linking to local services and park and ride etc, property developers should develop entire walking and cycling routes into local town centres. The cost of these would be minimal compared to the profits that they will make from the house sales, but could make a huge change to travel habits in residents moving into the properties. Links should also be made to schools, parks and other facilities for children to allow children to safely travel to and from school etc on bike and on foot do lessen the impact of the 'school run' with children given clear priority over traffic.
- * Developers could be asked to contribute to local scheme for example improving secure cycle storage at parks, schools and other local facilities.

A3: How should these actions be delivered and measured?

Design Measures:

* There are clear measures that can be used to assess the standard of efficiency of house construction both through the passive house scheme and the Energy Performance Certificate. I would expect a new built house to be graded A on the EPC to meet the tough targets of the climate emergency.

* Also as part of measuring, statistics on potential (or even live) power generation of solar PV, thermal generation of ground and air source heat pumps etc could also be published. It could also be permitted for the developer to keep the 'profits' from solar generation (where units are sold back to the grid) for a period of time as part of the contract of sale (I lived in a place that had a 10 year agreement similar to this).

Construction

* Include a clear charge to the developers for waste leaving the site, based on the type of waste and the quantity (not all waste is equal).

* Charge developers for each delivery with higher costs for partial loads and small deliveries.

Secondary Measures.

* Obvious measures are 'miles of cycleway or footpaths built/improved'. Less obvious ones could be 'rating' cycle ways or footpaths for their usage, quality and route. What I mean here is that you could have a beautifully constructed off-road cycleway that isn't used because it doesn't go anywhere useful (it was built in an easy to build place and cheap). You can also have a poor cycleway going to an important destination, e.g. an unprotected on-road cycleway that goes to a local primary school. Ideally of course we would have quality, protected cycleways going to important destinations and these could be 'rewarded' somehow.

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

They do, but could we also add extensive rainwater capture and storage systems for use in grey water systems for flushing toilets, watering gardens and parks and other uses where there is no practical need for using drinking water? Using drinking water to flush toilets is really quite silly!

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?

I'm slightly concerned by the potential for 'off-site' 10% biodiversity gains. Nature doesn't get 'moved', it is where it is. You can't ask birds, mammals and insects to move over to the next field so that you can build a house. The construction process should not allow for off-site. It should be all on-site. I would also suggest that 10% is not ambitious enough. I would expect a minimum of 25% - this would be easy by not laying grass in many areas and instead creating wildflower meadows and including detailed policies to ensure that they are rarely mowed. New houses could also ensure that lawns are minimal but instead wild areas are created.

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?

As mentioned in Q7, I do not believe these measures go far enough. I would expect it to be required to include some sort of microgeneration solution for each and every property, grey water recycling, electric charging points for each and every parking space and a minimum build standard of 'A' Energy performance.

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?

It is if clear and decisive policies are put in place without any options for offsetting or 'buying your way out'. It needs to not have loopholes and be fully enforceable in court.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No, installing many carbon zero measures are much cheaper to install en-masse and during the build are a lot cheaper. The developers can also take the buy back for units sold back to the grid for a period of time. There are ways that developers can make this viable. It would also allow local businesses to develop and offer the potential for job creation in this area.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I would suggest looking the Passivehaus scheme and an absolute minimum standard of an A grade for Energy Performance Certificate for new built houses.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Offer grants and support to homeowners and tenants to carry out measures not included in the Green Homes Grant such as Solar PV. Ensure planning rules allow and clearly support microgeneration solutions, even in conservation areas etc,

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?

I love this! Every house should do this. Remove the wording 'practicable and achievable' and 'ultra-low'. It allows such huge scope for not doing it. If it's a new house, then it has to happen and has to be carbon zero. There are no excuses and no reason why it shouldn't happen. I would also encourage new developments to include perhaps communal power generation too, for example on community buildings, which can be used to power LED street lighting and traffic lights etc. Remember that natural gas and biomass are *not* low or zero carbon.
We need to move past our squeamishness with conservation areas and listed buildings. They are beautiful buildings but they must be improved. All buildings must be brought up to the highest standard possible.

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

I would suggest a list of preferable order based on the efficiency and 'speed' of carbon neutrality including construction and installation. The list should allow for adaptation for new technologies.

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?

Yes! I would expect every single property to have to meet a minimum standard for power generation linked to the size of the property and its location (e.g. a flat may only be able to have one solar PV panel due lack of roofspace, but a house should have as many as will fit). Minimum standards could be met by very local generation (e.g. a solar farm in a neighbouring field, which is then planted with wildflowers and other biodiverse things).

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?

I don't think that there is any excuse for not having solar panels on all existing buildings. I would cheer if Salisbury Guildhall installed solar PV (and that is a listed building). The building is beautiful and should be protected, but what will happen to our beautiful cathedral and guildhall etc if climate-change impacts as we expect with regular flooding and permanent damage to these amazing buildings. The council should lead by example and start installing on every community, school and council building as soon as possible. Other private buildings should receive support including some financial support where possible.

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?

You need to include more details on the routes and quality of cycleways. Brave strategies are needed here that aren't going to be swayed by local, vocal, campaigns. Some of these policies may force change on people's lives, but it must happen and people may scream and shout but they will adapt. Businesses can be supported in ensuring deliveries can still arrive and customer collections can also be arranged. Basically be brave and then get on with it. Lots of people may shout about it, but sometimes the council needs to lead the population for their own benefit, much like a parent may upset a child for their own benefit.

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?

Bring back People Friendly Streets in Salisbury and actually do the scheme to completion with no abandonment. Introduce other local measures for both local residents and tourists such as electric cycle hire (or check out the scooter hire scheme in Cambridge - it's awesome!). Ensure a range of car charging points into our town centres and car parks and offer free parking to people who use electric and hydrogen fuelled car. Provide more secure, covered cycle storage, especially right in the town centres such as Market Square. Improve and widen pavements in towns to give priority to pedestrians and remove it from vehicle traffic. Push Salisbury Reds to use carbon free fuels (but not bio fuels as these impact food planting). For example, only allow electric buses right into the town centre,

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?

Push for more wind and solar generation in the area. Salisbury Plains would be ideal for a wind farm and there are huge areas where solar farms could be introduced with very little impact on the skyline.

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?

It may cost more, but what is the cost of not doing it? Many areas of Wiltshire could end up with serious flood damage and some of our most beautiful buildings being permanently damaged or lost (what would happen if the water levels were to rise and destabilise the gravel bed under Salisbury Cathedral?). This isn't optional and must happen.

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

Rep ID: Climate38	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Biddestone and Slaughterford Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Not only is it reasonable, it is absolutely essential. The UK Climate Change Committee's 6th Carbon Budget sets a target of 68% reductions in greenhouse gas (GHG) emissions by 2030, to keep the UK on track to its legally binding target of net zero by 2050. There is plenty of evidence that this is entirely possible with the right national and local policies in place, providing there is the political will to do it, and providing action starts now. The longer we wait to start, the bigger the challenge to live within the carbon budget.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

1. Calculate a meaningful GHG emissions baseline for Wiltshire that is as robust and detailed as possible (the Scatter calculation is far too superficial) and set year on year reduction targets to get to net zero.
2. Commit to every policy and every planning decision made by Wiltshire Council having an explicit GHG reduction assessment - meaning every policy must make a contribution to reducing GHG emissions in line with the year on year target, and every planning decision must be assessed for the impact it has on those emissions.
3. Set a requirement for all new build homes to be built to a zero carbon standard, which councils are legally able to do.
4. Ensure all plans for new settlements are fully assessed for their GHG emissions impact, and are developed in line with the latest thinking on sustainable development, for example, building on brownfield sites, incorporating public and active transport and reducing reliance on private car travel, incorporating renewable energy generation and natural carbon sinks such as trees etc. All this thinking is readily available to the Council.
5. Prioritise urban regeneration and use of brownfield sites, building on greenfield sites only were all other possibilities have been exhausted.
6. Conduct a realistic assessment of housing need in line with latest projections, not obsolete and discredited targets set by national government. Do not voluntarily increase the target for housing by 5000 above the nationally set target for Wiltshire.
7. Reassess estimates of traffic growth based on up to date models that take into account the long term impact of COVID on changes to commuting patterns, and the impact of national climate change policies on reducing reliance on private cars and modal shifts in transport use. The current Transport Plan acknowledges it uses obsolete projections, and yet road building plans in the Local Plan rely on this. All road building plans should be reassessed based on realistic traffic projections and take full account of the GHG emissions impact of new roads.
8. Include meaningful policies that achieve a significant modal shift in transport towards public and active transport, including reopening local railway stations, expanding EV bus routes across the county etc.
9. Create a planning environment that actively encourages renewable energy generation, particularly onshore wind turbines, which are the lowest cost form of electricity generation and for which there is ample opportunity within Wiltshire, even taking into account AONBs, settlement areas etc (as previous reports have shown definitively). It is a national requirement that onshore wind projects must demonstrate 'local support' via Local Plans, so it is essential that this is included in the update to the current Local Plan. Onshore wind in Wiltshire could make a really meaningful contribution to reducing GHG emissions, and without this it will be much harder to achieve the required reductions. This should include developing solar and wind generation on Council owned land.
10. Develop policies for enhancing natural carbon capture and improving biodiversity through land use. This should include massive expansion in tree planting on publicly owned land and creating incentives for other land owners to protect and enhance the natural environment.

A3: How should these actions be delivered and measured?

They should be included in the next update of the Local Plan. They should be delivered by changing planning policies and decision making processes. The measurement should be through having meaningful GHG emission reduction targets and measuring the impact of every planning decision against these. Where policies conflict with national legislation, Wiltshire should highlight this to national government and lobby for changes alongside other councils.

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

These seem to be sensible policies. It's hard to judge whether they will be sufficient as the extent of flood risk depends on the overall impact of climate change - the more this can be mitigated through reducing GHG emissions, the less the risk of extreme weather events such as flooding.

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?

This doesn't seem to be sufficient, and anyway as it is unquantified it is impossible to judge, e.g. what does 'ambitious' mean in practice? How about saying all existing natural carbon sinks should as a minimum be preserved and not destroyed by new development, and should be enhanced wherever possible through large scale tree planting and habitat restoration?

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?

Yes, this would be an excellent start. However it should also include policies to assess the impact of new build on the natural environment, and avoid building on greenfield sites that involve the destruction of existing 'GBI' and carbon sinks, unless this destruction is more than compensated for elsewhere.

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?

Yes it is, as has been shown by recent legal guidance from national government which enables Local Planning Authorities to set this standard even if it has not been adopted nationally. While there is bound to be push back from developers, this must be resisted. The UK Committee on Climate Change recently found that the additional cost of building to zero carbon standards is between 1-4% of the build cost, which would easily be absorbed by the house purchaser as they would get a payback of many times that over the lifetime of the property in reduced energy costs.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No, as the incremental cost of building to this standard is minimal (as quoted above) and the economic benefit to the homeowner massively outweighs this incremental cost.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The UKGBC standard would seem a sensible place to start, but if other similar standards are published then these could be adopted. Current building regulations are clearly not sufficient.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This could be included as a planning requirement in all planning applications on existing housing. The Council can support the development of the local retrofit industry by implementing retrofitting to all its existing estate (some of which it is already doing). It should work with local housing associations to encourage them to apply this to social housing.

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?

These measures would be good, but they need to explicitly include onshore wind generation. This is the lowest cost form of electricity generation, and there is plenty of scope within Wiltshire for this, taking into account AONBs, conservation areas, settlements, etc and local wind speeds. National legislation requires onshore wind to have explicit local support via Local and/or Neighbourhood Plans, so onshore wind needs to be explicitly included. BANES Council in their current Local Plan Review have included a map of their area which takes account of all land restrictions to identify zones where onshore wind would be feasible. Wiltshire Council should include a similar map in the next iteration of the Local Plan. Water power should also be included, on the main rivers in Wiltshire. While this will inevitably be limited in scope, water powered turbines provide a useful continuous form of renewable energy generation.

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

All technologies should be encouraged. There is no reason to exclude any viable technologies, and all will be needed to achieve the required reductions in GHG emissions.

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?

Yes. These would need to be set as part of the overall carbon reduction target setting exercise mentioned earlier, but the short answer is as much as possible as quickly as possible.

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?

This relies on it being economic for building owners to do this, which in turn relies on there being a well established industry producing the technology at affordable cost, supported where needed by government grant/loan incentives. Planning rules on conservation areas/listed buildings need to be relaxed to allow this in all but the most sensitive of settings.

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?

If Wiltshire takes GHG emission reductions seriously and implements the policies set out in this response, then air quality will take care of itself and would not require additional policies.

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?

- Stop building new roads based on obsolete projections of traffic increases

- Build new developments on a sustainable basis, i.e. incorporating all the latest thinking on reducing reliance on private cars
- Commit to phasing out ICE vehicles across the whole Council fleet by 2030
- Introduce cycling networks in all towns and villages connected to public transport (diverting funds from cancelled new road building schemes to do this)
- Work with providers of rail and bus transport to develop a more frequent, accessible and integrated public transport network
- Introduce further measures to deter private car use, such as increased parking charges, zero emission zones in larger towns. These should apply to ICE cars with EVs being exempt.

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?

National Grid and DNOs are working hard to solve this problem, and it is unlikely to be the barrier that this question implies. Key to solving this will be to massively increase local renewable electricity generation so that there is sufficient input to the grid to match the increased demand.

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?

I think this has already been addressed earlier. The Committee on Climate Change has shown that the incremental cost of zero carbon new build is only 1-4% of the build cost, so readily affordable by house purchasers as they will get many times the additional cost back in energy cost savings over the lifetime of the home.

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

It is encouraging that Wiltshire is asking these questions as part of the Local Plan Review, but absolutely critical that the response is incorporated into the next iteration of the Plan, in every single policy area. Currently the different sections of the Plan are disconnected and contradictory, with many policies (particularly Spatial Policy) directly contradicting the statement that 'carbon reduction is an integral theme in the Local Plan Review', as the current policies will massively increase GHG emissions, not reduce them.

Rep ID: Climate39	
Consultee code: General Public	Consultee Organisation (if applicable): Private individual
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No - the local Corsham and Chippenham plan makes no reference to this report or seems to take into account any of the issues raised within it. Instead they focus on how to grow the areas. Presumably other reports follow the same format	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<ul style="list-style-type: none"> - Local renewable energy generation - Encouraging a greater local economy and less travel and encouraging larger companies to engage in reducing travel requirements 	

- Increase green space eg by small allotment style planting as well as considering whether brownfield land should be reused
- Investing, or encouraging investment, in an electric vehicle infrastructure
- Creating a more-joined up travel policy
- Encouraging and investing in walking and cycling routes
- Promoting local food production and sharing

A3: How should these actions be delivered and measured?

A county wide plan that then produces specific local area targets and recommendation. Measure meant by carbon emissions

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

I don't feel qualified to answer

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?

No. Old brownfield sites should be developed as pure GBI sites. Maintenance should be for the lifetime of the development. There needs to be regretting of existing developments

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?

No - the wording is too woolly. There also needs to be a set of requirements that housing developments include local services, walking and cycling infrastructure and local transport provision.

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?

Yes - no planning permission granted without it. 2023 is too late: do it now!

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Possibly, but this should not be a reason for not adopting it

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

A grant scheme should be made available. The local population should also be educated more

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?

The council should only purchase energy from renewable sources going forward. The wording is too woolly again - where practical and achievable offers too many get out clauses

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

All technologies that are renewable (ie not nuclear)

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?

Yes. Smart metering should provide suitable means of measuring

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?

Grants for development but also a requirement for businesses to demonstrate that they are purchasing renewable energy

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?

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?

- See previous comments:
- Encouraging a greater local economy and less travel and encouraging larger companies to engage in reducing travel requirements
- Investing, or encouraging investment, in an electric vehicle infrastructure
- Creating a more-joined up travel policy - eg timing buses and trains to connect with each other
- Encouraging and investing in walking and cycling routes

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?

Timed charging infrastructure that allows for overnight only charging. Investment in local energy production. Presumably this is a national problem that will also need central government intervention

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?

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

I don't feel that this report and questionnaire is worded in a way that encourages the general local population to respond

Rep ID: Climate40	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>In short no, particularly based on recent history of poor quality development, focusing on travel by car, poor quality housing and lack of funding for non-car modes of travel. Wiltshire Council don't even apply current best practice, in terms of Travel Plans (actually enforcing them, not just a paper document, and not great when many schools still don't have them and there is no Travel Plan Officer- possibly liaise with [NAME REDACTED] in Swindon) , BREEAM requirements on homes and, focusing travel requirements on non-car modes(e.g. North Chippenham will have a new link road, but has no off site cycle/pedestrian improvements, or even connect to any cycle links, still has no bus service, and the existing access rbt, whilst completed for cars a year ago, still has dangerous defects for pedestrians/cyclists). This is just an example of the poor practice exhibited, which needs to be drastically changed in the future.</p>	

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

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
 - Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
 - Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
 - Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
 - Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
 - Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
 - Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
 - Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.
- Introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth.
- Follow the recommendations on planning made by the Climate Emergency Task Group

A3: How should these actions be delivered and measured?

See above

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

Potentially if properly enforced.

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?

How does a new development, that decimates existing farm land achieve a 10% net biodiversity gain?

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?

Potentially, if enforced, which Wiltshire does not have a great track record of.

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?

I would like to say yes, but this will require such a massive change of direction from Wiltshire Council, that I can't even see it happening before 2030.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No idea.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The most rigorous standards possible, and ensure they are checked properly so ensure developers don't cut corners.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Grants for fitting solar panels, heat pumps, etc.

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?

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

All technologies, but focused on energy development on site, rather than commercial solar farms.

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?

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?

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?

Potentially, if the policies are rigorous enough, and then enforced. Wiltshire Council do not have a great track record with sustainable travel.

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?

More charging points, all new developments should be front loaded with comprehensive connections to improved off-site pedestrian and cycling routes. New high quality bus services/strategy in all new developments, funded by the developer from day one, rather than starting once most of the development is in place. Penalising high car use (even electric) from a development, with penalties used to fund for non-car improvements. Reducing road space for cars, and reprioritising for pedestrians/cyclist. Adding clean air zones and requiring deliveries in urban areas by electric vehicles/or cargo bikes.

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?

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?

Ensure they are better designed, but will cost more and developers will come up with endless excuses about sites not being viable.

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

Rep ID: Climate41	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Yes. Driving the green agenda through planning approval at a strategic level and reserved matters planning applications at a granular level is achievable.</p> <p>Strategic decisions could be taken to promote sustainable transport solutions for new developments. This does not need to cost prohibitive but requires the planning system to deal preferentially with master planning and developers that assess the cycle network and public transport as part of their proposals.</p> <p>On a site specific basis reserved matters can drive improvement of design and specification within residential buildings and non-residential buildings. This will require suitably experienced consultees within the council (perhaps outsourcing is the answer).</p>	

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

Development must be preferentially targeted where there is access to a cycle network linking an urban centre or reliable public transport, especially branch line train stations where equivalent CO2 emission is by far the lowest of fossil fuelled powered personal travel.

Developments where the national grid gas network can service properties should be considered superior rather than off grid developments. Home heating oil produce has a higher equivalent CO2 compared to natural gas

A3: How should these actions be delivered and measured?

These actions should be delivered via Local Plans and countywide planning policy. The data or method of collecting the data has not been presented for the pie chart shown however i imagine this would form a suitable base line against which improvement can be measured.

Where specific policy is introduced, ie preferential planning approval for those developments linked to a cycle network or adjacent to branch line train station then no. of properties approved as described / total no. of properties would be an interesting metric.

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

all sounds sensible, i'm not an expert

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?

Yes, this is an excellent list.

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?

Promotion of the a green construction industry should be stronger. This is being lead by investor on larger schemes across the country however this is no reason why the council cannot run ahead of the fairly loose target of producing a strategy. This strategy should be set with zero carbon construction and net zero development as priorities. It will only be by leadership that smaller developments / developers will adopt the green agenda.

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?

This is ambitious by 2023. There is nothing wrong with ambition and in the green arena this is a fantastic target. Some serious assessment of the supply chain would be needed to ascertain whether this is realistic though. Based upon modular buildings / off site fabrication there is currently major investment in this area and perhaps a more realistic target would be 2025.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Currently, then yes. Once the supply chain has caught up then no. With notice, ie the Local Plan is to be ratified in 18-24months then the supply chain knows it must invest in order to be awarded contracts. I am sceptical as to whether without the 'stick' that the supply chain will engage fully.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The council should follow the lead of central government to ensure best possible building methods cover new development in the country.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Grants should be available for insulation (roof, cavity wall etc) without qualification, for replacement windows and boilers

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?

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

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?

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?

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?

Assessment of existing infrastructure, eg school places, road network, cycle network etc should form a key part of the planning consultation process. Where schools are at or near capacity granting permission for additional development will result in more car journeys to and from schools, especially primary schools where parents tend to drive children rather than utilising public transport due to the age of the children. Where existing road network is poor or access a viable cycle network is lacking (the cycle network would need to link with an urban centre) developments of these kind should be looked at negatively

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?

Low Emission Zone / Public Transport only in urban centres should be a minimum.
Increase in charging points would probably be unnecessary as most journeys are likely to be relatively short with charging available at private residence / place of work

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?

Cost of electric car must come down and be comparable with internal combustion for the grid to be overwhelmed. I imagine there will be plenty of time for consultation with the DNO/DSO's in order to resolve. Local power generation (turbines, CHP etc) will likely offer a solution in the medium to longer term.

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?

Power supply to new properties must be future proof to allow charging of vehicles. This may need to be subsidised by central government / electricity producers.

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

This

Rep ID: Climate42	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No, significant detailed policies are required to reduce carbon emissions in Wiltshire. The Plan currently does not include these, it needs to include the right policies, implemented immediately for Wiltshire to have any chance of reducing carbon emissions to zero by 2030. That is why this Plan is vitally important and why climate change needs to be at the heart of this whole Plan not just applying to bits of it.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

1. New developments should only be built where there is a local need for local people with local jobs, rather than using out of date housing targets. All developments need to be built as carbon neutral as retrofitting costs a lot more in the long run. Developments should use renewable energy sources eg solar panels and heat pumps and building materials should be low carbon themselves and recyclable at the end of their life. Electric car charging points should be included as standard and car use should be actively discouraged in favour of using sites close to cycleways and public transport. Greenfield sites should be avoided.
2. Retrofitting existing homes/offices, the Council should offer loans to make existing homes more energy efficient and should award contracts to firms who can complete this work, allowing homeowners to benefit from lower costs.
Transport – developments should be built where access to public transport and active transport is nearby, avoiding the need for car use. However, for this to happen public transport needs to be cheaper, more frequent and routes extended, as it is sometimes impossible to practically get from one place to another. Cycling and walking routes need to be upgraded and 20mph limits introduced in town centres. Car sharing and electric car use should also be promoted.
3. Major road schemes - realistic traffic projections need to be calculated and need to include the impact of Covid-19, as home working is now a lot more common. Major road schemes will only increase carbon emissions and encourage car use. The emphasis needs to be on encouraging the use of public and active transport instead.
4. Tree planting – there needs to be a major step change to plant a lot more trees in parks, woodlands and on other green areas. Liaising with local community groups could provide the opportunity to do this at reasonably low cost to the Council. Avon Needs Trees and Transcoco are community groups who would be interested.
5. Renewable energy generation, the Council needs to allocate land to generate energy for the County, such as setting up onshore wind farms.
6. Agricultural land needs to be protected especially where it uses sustainable farming methods and provides local people with locally grown food.

A3: How should these actions be delivered and measured?

For the Plan to work, Wiltshire needs to calculate its current carbon emissions and work out yearly targets to enable the County to reach zero carbon by 2030. Targets could then be compared to actual carbon emissions each year and action taken where targets are not being met. The Plan needs to have specific policies which must be followed by developers to build zero carbon homes and this must be monitored during completion with hefty fines if developers do not comply.

Investment is required in public and active transport, it can be as simple as promoting electric vehicles and car share/car club schemes to individuals and businesses including offering incentives. As well as providing subsidies to enable bus companies to offer discounts. The hopeful decrease in car numbers can be measured and bus companies could provide hopefully higher numbers on bus use. The Council could hold climate change fairs with local environmental groups and representatives from electric car companies and car share schemes to encourage people to see what is possible.

Retrofitting existing buildings could be encouraged by offering loans or grants and the Council could make this cheaper by recommending one company, which could also estimate carbon savings.

Tree planting targets, reviewed annually.

Recycling - use Bath BID's idea and agree a contract with a single waste provider which means businesses pay less to recycle waste than they do to get rid of it as general waste.

Climate change policy needs to apply to all aspects of the Plan otherwise net zero by 2030 is impossible.

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

I am not a water management expert so I do not feel that I can say if the above measures are sufficient. New estates do seem to have water drainage issues though, I assume because developers are not interested in spending time and money in providing proper drainage for green areas. The drainage in Katherine Park Field is awful and makes the grass areas unusable a lot of the time, especially in the winter. Ensuring that developers properly manage these areas so that homeowners have decent recreational space is vital.

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?

The best solution would be not to destroy our woodlands and fields in the first place. If development is really necessary then a greater proportion of developments should be given over to natural areas. This would ideally mean keeping areas of existing woodland and fields and incorporating them into designs therefore the biodiversity is already there and trees are already filtering

the air. It seems that most new developments around here include a few newly planted trees and very poorly drained poor condition grass areas which is not sufficient to encourage biodiversity. Reducing car use could help air quality as well.

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?

The above would significantly help to achieve a net zero carbon future however, we need clear, specific policies in the Local Plan so that developers know exactly what they should do and know that they will be fined if they do not follow the policies.

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?

Whether this can be in place by 2023 or not depends on the Council completing the plan and implementing it as quickly as possible. If developers were to be involved early on in the process then I do not see why they could not be ready. However, I find when dealing with the Council that there is always needless bureaucracy and unnecessary delay even for really simple matters, so for that reason I am not that hopeful that this can be accomplished. Cut the red tape and simplify processes, the world cannot wait....

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Zero carbon new development will initially be more costly and probably take longer to implement, so I think that this could affect scheme viability at least initially.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I think it's called the Future Homes Standard now, the Council should use this.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

By way of grants and loans. Also by working with a preferred contractor who could offer the retrofitting and modernisation at lower cost to individuals and companies.

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?

No. A comprehensive planning framework is required which promotes renewable energy generation in Wiltshire. This should include solar and onshore wind farms. Residents could also change to green energy tariffs or Wiltshire Council could set up their own provider and offer really competitive green energy rates.

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

Wind should be favoured as it generates the lowest cost form of electricity. However, solar is more practical for individual homeowners.

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?

There is no reason why the target for use of renewable energy should not be 100%. All residents should be able to switch to green energy tariffs. Production of renewable energy in the County is tougher and would depend on eg setting up onshore wind farms.

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?

Grants could be allocated to retrofit existing buildings. I do not have sufficient knowledge to answer the other 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?

I do not think the measures go far enough. I would like to see 20mph maximum speed limits introduced in urban areas as well as vehicle free town centres.

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?

1. Public transport - developments should be near good local public transport which needs to be cheap and frequent.
2. Active transport - planning policy could specify the provision of cycleways and decent pathways/routes across the development, preferably tying up with similar in the local area. Provision of more bike racks in the community too, to encourage use by visitors. Developments should not be built in areas which would make new homeowners dependent of their car.

3. Greener fuelled vehicles - planning policy could specify the number of electric charging points required in each development per number of new homes. New homeowners could request a charging point before moving in much the way that they request the colour of the carpets. And/or there could be communal charging points. Greener vehicles are currently more expensive so making grants or interest-free loans available may help take-up. The Council could also encourage electric car clubs.

4. Car share - where the above use is not possible, the Council could also encourage car share groups, especially at large local employers.

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?

A bit like Economy 7, make it cheaper to charge overnight when electricity use will be less.

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?

Zero carbon development is going to be more expensive initially but the price should fall once it becomes the norm. I think that this will have an impact on the viability of schemes.

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

Rep ID: Climate43	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Steeple Ashton Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The Local Plan largely deals with the proposals for new housing and infrastructure, it does not deal with the existing built environment. Given that the majority of emissions will come from the existing building stock and transport, there seems to be little scope for the Local Plan to deliver a significant reversal of carbon emission trends in its current form before 2030. The highest contribution of greenhouse gasses in Wiltshire stems from the transport system, and predominantly private car use. As a county that has a large area of rural communities, it is unlikely that private transport in those areas will reduce.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

If the Local Plan were to be more ambitious and look at the replacement of poor quality, existing housing, rather than urban sprawl onto green spaces, then it would do more to reduce carbon emission trends. Higher density urban development nearer the central town services gives the opportunity for a range of carbon saving measures – better insulated properties with renewable or communal heating systems, lower journey distances to facilities, protection of green spaces. More emphasis is also needed on how to reduce journeys by private car and switching to more efficient means of transport. Employment opportunities need to be developed so that commuting outside of area and county can be reduced.

A3: How should these actions be delivered and measured?

1. A robust transport infrastructure implemented where it incentivizes using greener transport solutions. This has not been borne out by reductions in local bus services, and routes.
2. Employment opportunities are developed with public transport support, incentivizing a reduction in private car use.
 1. Improve the employment level v housing ratio in the larger towns. i.e. where Trowbridge has a huge housing plan it is not supported by employment opportunity. Residents are required to travel out of county area for employment.
 2. Provide incentives to improve household emissions; supporting owners of older building stock.
 3. Invest in shop local/work local schemes.

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

The above measures would have a very measurable impact for new developments. There should also be a review and measures on current water management as a large volume of water is 'lost' due non maintenance and lack of investment in infrastructure. This may have a bigger impact.

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?

GBI assets should be designed with regard to the surrounding environment so that maximum benefit is provided to biodiversity and so that these areas are connected. Consideration may be needed to keeping some areas inaccessible to protect more sensitive species and limiting pet exercise in others (eg SANGS type policies).

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?

Yes this would deliver. Particularly with regard to existing buildings. Wiltshire has a high volume of listed and old buildings that are valuable assets to the community and would need support with improving their carbon footprint; particularly where existing rules prohibit implementation of energy saving initiatives.

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?

WC should be guided by national policy on this; 2023 may be too ambitious. It will have to be accepted that some of our traditional brick building styles will not be feasible under this policy, unless we start to recycle existing materials more widely (eg bricks and roof tiles).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

As with any change, the early schemes will be more costly and may need subsidy. However, as time goes on these costs will reduce as the building industry adapts.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The building industry needs consistent standards across the country. However, Wiltshire Council could implement higher standards where there is no conflict on national levels, but where an enhancement could drive higher standards in the future. e.g. scoring systems where there is a minimum grade and a scale for enhanced grades. This incentivises future development to achieve better. If we plan to make greater use of pre-fabrication in our housing developments, then conformance to national standards will be necessary in order to obtain maximum benefit from production line techniques.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Start by upgrading the buildings it already owns or manages. Publicise the available grant schemes. Make funding available to low income families and charitable organisations. Consider placing a multiplier on Council Tax banding depending upon the EPC score of the building to encourage improvement. Audit rental properties using a random sample approach to check for compliance to EPC requirements.

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?

There may be opportunities for recovery of waste heat from sewage effluent in some of Wiltshire's bigger towns. this could be used in conjunction with heat pumps for heating new developments using a heat network.

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

All technologies should be considered to ensure that development improves. if you limit it, then you limit the introduction of the 'latest' scheme. Backward step. Some households may need subsidy or support - in those cases it could have a preference dictated by the Council; economy of scale/buying power.

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?

Targets should be geared towards achieving the net zero carbon objective by 2030, and a baseline established of what is installed now. Plans should then be made with local councils for phased implementation to achieve the needed annual installation. A survey should then be made each year to assess the total installed and any adjustment to the plan should be made to correct any slippage.

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?

New incentive schemes are needed to encourage adoption of these technologies and thus further drive down installation costs. Conservation areas may need the formation of energy cooperatives to deliver energy from nearby schemes so that the character of the listed buildings is not marred by the installation of solar panels for example. There is an opportunity to implement rural solar PV schemes using ground-mounted arrays - thus delivering more cost effective solar energy than roof-mounted solar PV. In the absence of a government incentive, there would be a need for Wiltshire council to establish its own energy company and then negotiate with DNO's for reduced transmission charges (on the basis that the local solar PV would only use the local distribution network). Local community energy companies could fund the implementation and local residents would benefit from lower tariffs than current market rates.

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?

There seems little detail in the policies as presented. WC should consider establishing smoke free zones in areas particularly susceptible to particulates from domestic fires, wood burners or bonfires. Major industrial emitters must be carefully regulated and located so as to cause minimal impact to their environment. How does this link with Wiltshire's Transport policy and local employment? Both of these drive a high proportion of transport use.

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?

Establish more air quality management zones where polluting vehicles have to pay a fee to enter or pass through. Ensure all areas have access to fast broadband connections to enable more long term home working. Work with employers to drive down travel requirements (home working, meetings) and parking for electric/hybrids at workplaces. Provide a financial incentive, through Council Tax discount, for houses with charging points and / or an electric vehicle registered at the address.

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?

Begin this consultation as early as possible. Make space in Local Plans for the necessary power infrastructure; be this, substations, cable wayleaves, pylon routes. Designate locations for renewable power generation so network connections can be run to them.

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?

Scheme design will likely be very different in form, using smaller buildings, pre-fabricated and built of wood and orientated to the sun. A more modern design approach to build may result with greater window space and light. This may challenge the standard view of build and methods. Initial costs will be higher, but these will come down as the market adapts to the new ways and production lines can be established.

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

Generally people have a desire to contribute to improving their greenhouse impact; it is not so easy to achieve at the speed with which the infrastructure supports it. Education is key and it needs to be shared from Council level and not always through sales literature from companies with vested interest.

Rep ID: Climate44	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Claremont Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): European Property Ventures	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
It is considered that land-use policies within the Local Plan can go some way towards meeting the issues associated with climate change, however this cannot be done alone and there needs to be a stepped change in people's attitudes towards climate change. It is an ambitious plan to suggest that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030. Nonetheless, through adopting realistic policies through the Local Plan this will go some way towards meeting these target	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

The introduction of Local Plan policies that consider the following issues are practical steps that can be taken to significantly reduce carbon emissions by 2030:

- Bio-diversity net gain improvements;
- The promotion of energy efficiency in new and existing buildings;
- The encouragement of energy generation from renewable and low carbon sources including for example solar power and ground source heat pumps,
- The introduction of electric vehicle charging points to new residential and employment development;
- Encouraging the use of Sustainable Urban Drainage systems to be provided on site where possible;
- The promotion of sustainable travel and air quality.

These are all considerations that the Local Plan can practically implement that would assist in reducing carbon emissions by 2030.

A3: How should these actions be delivered and measured?

The Local Plan can introduce land-use policies as suggested in A2 above and review their effectiveness through local plan monitoring. It is suggested however that the reduction in carbon emissions is not for land- use planning alone and that it will be important for Wiltshire Council to work with partners to learn from best practice and drive through change.

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

It is considered that the proposed measures will go some way towards tackling climate change. One of the most important measures is through the introduction of SuDs which will ensure water is positively managed and also provides biodiversity benefits. Other measures that could be incorporated include green roofs, rainwater harvesting through water butts to allow the capture of rainwater for garden irrigation and permeable paving. Reduction in water consumption measures can also be incorporated into the design of buildings through the use of dual flush WC's, water meters and low flow fittings.

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?

The measures will go some way to meeting the targets. The provision of a 10% net biodiversity gain is enshrined in the Environment Bill and is likely to become law in 2023. This can be delivered on site via habitat creation or enhancement via landscaping and green infrastructure including hedgerow creation. Not all sites will be able to provide on-site provision so the LPA should also consider the ability for developers to provide off-site provision through habitat creation on landholdings or via habitat banks. Section 106 contributions for off-site contributions should however be reasonable and not affect the viability of scheme

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?

It is considered that the sustainable design and construction measures identified will assist in tackling climate change. A key element of the delivery of low carbon and energy efficient buildings is the 'Fabric First' principle. This recognises the most effective way of minimising carbon emissions is to reduce the demand for heat and power through a well-insulated, energy efficient building fabric and is widely regarded as best practice and is therefore an important step in reducing carbon emissions. Thermal energy demand measures can also be incorporated into the design of schemes where consideration can be given to the incorporation of solar panels, maximising daylight and sunlight with buildings orientated towards the south where possible, the inclusion of high efficiency lighting and material selection to provide optimal thermal benefits.

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?

It is considered that all new development to be rated as zero carbon from the date of the Local Plan is adopted in 2023 is too ambitious and not a realistic time frame. The government's own targets are to tackle climate change and get to net carbon

emissions by 2050. The development industry already provides many measures for carbon reduction including sustainable construction techniques and sustainable design considerations that all aim to reduce carbon emissions however zero carbon target in two years' time is not considered feasible. It will be necessary for Building Regulations to be updated and the Council to work proactively with partners to learn from best practice and drive through change which will take longer than 2 years to implement

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

As identified above, the development industry already provides many measures for carbon reduction and are at the forefront in tackling climate change through the introduction of sustainable construction and design techniques. The Council need to be fair and reasonable in their expectations in deciding how to implement Local Plan policies. Many measures such as bio-diversity enhancement, improvements in landscaping and electric charging vehicle points can be incorporated without materially affecting the viability of a scheme. However, planning permission should not be withheld where some development proposals cannot provide on-site provision and the LPA need to be aware of different circumstances and ensure a flexible approach is provided.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Building Regulations need to be updated to require the performance standards of new buildings to be improved. Consideration should also be given to New Homes Standards to provide a standard for the development industry to aspire to.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Improving the standards of existing buildings is vital in tackling ill-health. A Report by Policy Exchange entitled 'Warmer Homes' has found 2.3 million households in England live in fuel poverty. Households in the most energy inefficient households would have to spend an extra £1,700 a year to heat their homes to a suitable level and 10% of excess winter deaths are directly

attributable to fuel poverty. Improving the housing stock will also produce financial savings by reducing energy bills. The Council should look to replace internal fittings including high efficiency boilers, insulation and windows and offer grants to homeowners to undertake the work.

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?

There needs to be some more flexibility in the policy for sustainable energy generation and management. Some of the measures are realistic such as the introduction of solar panels on new buildings but this would not be realistic on retrofitting on listed buildings. The requirement for 100% electric heating, cooling and energy systems powered by air or ground source heat pumps or through off grid solutions in all new buildings is not practical, viable or feasible.

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

The Council should have a policy that supports the provision of renewable energy and low carbon technology, this could include solar farms, wind turbines, hydro power technology. This is more realistic as not all technologies have the ability to provide green energy in Wiltshire.

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?

It is not considered that the Local Plan should set targets for the production and use of renewable energy. Advice in PPG at paragraph 003 (Ref: ID:5-003-20140306) states that the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. It goes to state that whilst local authorities should design their policies to maximise renewable and low carbon development, there is no quota which the Local Plan has to deliver.

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?

The Council should look to replace internal fittings including high efficiency boilers, insulation and windows and offer grants to homeowners to undertake the work. In terms of heritage assets advice in PPG at paragraph 007(Ref: ID:5-007-20140306) is helpful. This recognises that the need for renewable or low carbon energy does not automatically override environmental protections. It states that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. It is therefore considered that internal improvements could take place but a blanket approach of requiring all listed buildings to have solar panels retro-fitted is inappropriate and does not accord with national guidance

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?

Consideration could be given by the Council to provide a fund to support SMEs to purchase and/or lease compliant Heavy-Duty Vehicles or retro-fit non complaint vehicles to achieve compliance and improve air quality. Consideration could also be given to grants to support the upgrade of taxi fleets through retro-fits, purchase of hybrids or electric vehicles. Hydrogen buses are also an important factor in improving air quality.

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?

There are a number of practical policies that the Local Plan can introduce to increase modal shift to public and active transport and speed up the transition of greener fuelled vehicles. These include reallocating road space away from single occupancy cars to lanes for public transport, implementation of low traffic neighbourhoods where priority is given to pedestrians and cyclists, provision of e-bikes and e-scooters particularly in town and city centres to reduce reliance on the private car and provision of green links and pedestrian friendly, well-lit routes, to encourage safe journeys by foot

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?

They could encourage users to charge vehicles at off peak hours and reduce costs for less popular times. There is the possibility to introduce smart charging which is a system where vehicles are plugged in but don't charge until they receive a signal from the grid that demand has tapered off a sufficient amount to charge the car.

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?

Any requirements for developments to promote zero carbon living should be reasonable and proportionate and should not affect the viability of development coming forward.

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

Rep ID: Climate45	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes. It can ensure that low carbon development, such as zero carbon homes, renewable energy installations, greatly increased provision for active travel and support for re-afforestation and regenerative agriculture are at the heart of planning. While the Climate Change paper is to be commended, the ESS has not yet succeeded in ensuring that these issues are central.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

- Ensure all new housing and commercial development is built to zero carbon standards, introduced as soon as possible and going beyond the proposed national Future Homes Standard.
- Ensure that planning permission for retrofitting includes requirements for the strictest possible upgrading of existing homes.
- Ensure plans for new housing are based on a genuine assessment of need, rather than top down targets, and situated to avoid commuting.
- Reassess the need for planned road schemes, taking into account changing work patterns due to COVID, as well as the need to reduce carbon and address air pollution.
- Provide updated analysis of the renewable energy resource countywide, including the scope for onshore wind, together with landscape analysis into its impact. Together these should identify the areas with most potential.
- Increase spending on pedestrian and cycling provision rather than on building new roads.

A3: How should these actions be delivered and measured?

Provide a robust baseline, either using SCATTER or another monitoring system better suited to rural areas. Develop a well-researched and practical plan for reaching a carbon neutral Wiltshire by 2030. This might identify key barriers, such as national government policy, as well as opportunities eg in the green economy. Monitor and report regularly on progress from the baseline and according to the plan, including in an accessible and popular format.

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

No. The emphasis on SUDS is welcome. This should include the provision of rain gardens, including in existing properties, especially where front gardens are being concreted over for parking.

There is a need to recognise that run off from farms and housing can create flooding a long way away. There needs to be more proactive development of natural flood risk measures (wet woodland etc) and changes to arable farming (eg new hedges) more widely not just near new developments. An action plan with farmers would be helpful, working with those already leading the way on regenerative farming (eg [TEXT REDACTED] in Winsley who are splitting their fields into smaller entities and planting new hedges) as well as with the remaining county farms.

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?

This is a good start. Further suggestions:

- Provide support for nature based solutions/Green Blue infrastructure in existing as well as new developments.
- New solar farm developments should be required to develop and implement a wildlife management plan. This makes the most of the 25+ year timescale. The benefits for wildlife on solar farms have been well documented.
- Work with farmers and other growers as suggested in section B1.
- Encourage other town and parish councils to undertake a biodiversity review, as has been done in Bradford on Avon, and incorporate the recommendations into both the Local Plan in future and Neighbourhood Plans.

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?

Yes. It is essential that zero carbon is achieved onsite in new developments as proposed. These suggestions need to be clearly incorporated into the Local Plan. They should go beyond the national Future Homes Standard and be introduced as soon as possible. Ideally, new developments could become carbon positive, producing more renewable energy than they use. Provision of sites for self build should be supported, since it has largely been individuals who have led the way in building zero carbon homes, often because standard new build doesn't meet their aspirations. Finding a site is one of the main barriers for those who would like to do this.

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?

Yes. Zero carbon construction adds little to the cost, especially in volume building. This is an area where Wiltshire could profit from developing expertise, eg in offsite construction. A main constraint is expertise in the building sector with a need for increased training and new entrepreneurial approaches.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No. The additional cost is minimal when compared to the cost of retrofitting or running the new homes. There is now greater awareness and information on the long-term financial benefits of zero carbon new homes; this could be promoted further.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The current Building Regulations and the proposed New Homes Standard are not fit for purpose, and homes built to these standards will require costly retrofitting in the future. The Council should adopt more rigorous standards perhaps based on the UKGBC framework or similar. Liaison with neighbouring local authorities would be useful, as well as with the Local Government Association to agree a national zero carbon standard that goes beyond the one proposed by government. This is an area where local councils can show leadership.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

- Ensure rigorous low carbon requirements when works are carried out, including for the existing building fabric.
 - Ensure householders are aware of the potential for technologies such as heat pumps with underfloor heating when making changes and applying for planning permission. Plus information re funding sources etc.
 - Provide training for Building Inspectors, including those operating in the private sector, and other building professionals. The development of a green construction industry, as suggested, is key, with a list of local builders who have completed green construction training.
 - Provide and promote exemplars of successful retrofitting of the Council's own buildings and housing stock.
- This is an area where the planning system can signpost householders and others to opportunities, funding etc, working closely with wider initiatives.

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?

The measures outlined are to be welcomed as far as they go. There are two important additional measures.

First, the Council should commission an updated wind resource analysis, plus wind development landscape sensitivity analysis, to identify areas with potential for wind that also meet landscape criteria. This is not something which should be done by individual neighbourhood plans or on a piecemeal basis. It is high risk for wind developers to take this on, particularly in the light of Wiltshire Council's negative policy on wind in the past (despite widespread public support – see BEIS polls). The most recent energy strategy dismissed wind as an option for landscape reasons, but without any evidence to support this. Once there is a wind opportunity map, the options can then be considered in Neighbourhood Plans etc.

Secondly, with respect to solar farms, there is now the start of a backlash as the numbers increase. Clear criteria should be provided to help ensure that these continue to be supported locally. Eg to be built on grade 3 or 4 agricultural land, to be mounted so that sheep or other agricultural activities can be carried out underneath (cheaper anyway as it reduces the need for mypex or strimming) ,to develop and implement a long term wildlife management plan, to either partner with a local community energy organisation or to contribute to a local community fund.

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

The Council should encourage all technologies. To meet the carbon neutral goal, we need all possible renewable energy sources. Re policies, see comments in B8 re wind and solar farms.

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?

Yes. This should be part of monitoring progress towards the carbon neutral goal. A clear road map should be developed showing how the Council proposes to meet the goal of making Wiltshire carbon neutral by 2030. Renewable energy targets are an important part of this. While the standard measure is MW (existing, planned), it may be easier as part of a promotional/awareness raising strategy to also measure progress in terms of the equivalent number of households, based on Wiltshire average household electricity use. While household electricity use may vary over the years (eg with increased EVs, heat pumps), this is more understandable in getting across the wider message.

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?

The major challenge is improving the energy efficiency of these buildings. As regards energy production, technology such as solar panels on the roofs of Listed Buildings and in Conservation Areas should be acceptable in view of the climate emergency. There now plenty of precedents, and expertise from eg English Heritage, National Trust etc. In time less visually intrusive technology may become available.

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?

No, they do not go far enough, although an emphasis on increasing the level of self-containment of settlements is welcome. Based on experience of the Bradford AQMA, there has been little progress in tackling air quality. The key is reducing the use of the private car. There is a danger that the Bradford traffic will worsen with Bath's new CAZ, highlighting the need for a broad geographical strategy that crosses county borders.

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?

- Stop building new roads, which only serve to increase traffic.
- Spend more money on cycle and footpaths, with more emphasis on applying for national funds to do this. Ideally, cycle and footpaths should not be alongside busy roads, which makes for an unpleasant experience - with new ones, at least allow for a hedge barrier - good for biodiversity too.
- More 20mph speed limits in towns and on single track rural roads. More town by town analysis of the options for walking on journeys under a mile - is this a safe and pleasant experience? More pedestrian crossings.
- EV charge points in all new developments.

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?

- Map areas where generation can be linked to electricity use, including EV chargers. Car parks with solar canopies and chargers? - Work with community energy organisations, parish councils etc to identify suitable sites.

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?

There are already exemplar zero carbon developments, such as Parc Hadau, Wales, Springfield Meadows, Oxfordshire and Goldsmith Street, Norfolk, which won the Stirling prize last year. These prove that zero carbon schemes are viable, well-designed and becoming more popular. It would be good to see Wiltshire take the lead in this area, learning from experience elsewhere, and actively supporting green construction.

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

The Climate Change and Biodiversity recommendations are to be welcomed. The challenge now is to ensure that they are fully incorporated into the Local Plan, with the sense of urgency required. There is no time for business as usual.

Rep ID: Climate46	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Tisbury Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
It may well be that Land-use policies of themselves will not be sufficient to make a significant difference to carbon emission trends before 2030, but that is not a reason not to do anything. The Council has to recognise its responsibility to set an example with its own policies and procedures; and to ensure that Land-use policies are so phrased in order to at least make a contribution towards Climate objectives.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

At the very least, ensure that all policies and procedures are all in alignment and that every employee in every department understands the contribution they can make. The Council needs to ensure that it underpins a positive climate-friendly culture throughout the whole organisation, otherwise there will be a perception of “do as we say but not as we do” which would not be healthy.

A3: How should these actions be delivered and measured?

It is for the directors of every department to ensure that Climate-friendly policies and procedures are defined and implemented throughout the organisation. Every member of the Council should be able to contribute to a culture of reduce, re-use and recycle.

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

No – the proposed Policy Theme 1 is full of “get-out clauses”, essentially enabling developers to do exactly as they please. The measures do not go nearly far enough. The words “should” and “could” must be replaced by “must” and “will”. Remove all references to “where technically feasible”. If a developer argues that a particular development will not be technically feasible, then planning permission should not be granted and should be refused. Developers need to understand that they cannot continue to hold communities to ransom.

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?

Again – Policy Theme 2 is weakened by the use of the word “should”. Replace “should” with “must” and then the policy might have a better chance of success.

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?

Again – Policy Theme 3 is weakened by the use of the word “should” and “could.” Replace “should and could” with “must and will” and then the policy might have a better chance of success. Developers will always argue the case for the cheaper option. Unless higher standards are demanded of them, they will continue to ignore UKGBC objectives and targets.

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?

The Council has an opportunity to set high standards. If it doesn't water down its policies with pathetic words like “should” then net zero targets ought to be achievable. Possibly a phasing-in policy during the first few years of the Local Plan might be helpful if agreed through S106-style agreements.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Developers may well argue that net zero targets will affect scheme viability. Tough on the developers. They have to recognise that they must take responsibility for their actions and they can't carry on destroying the planet.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

There is no excuse for not implementing the highest possible standards of building control.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Retrofitting and modernising of the existing housing stock is already supported by Government grants. The Council could help to promote greater uptake by ensuring wide publicity eg promotional and information leaflets sent with every Council Tax demand letter. Educate house-holders with worked examples of typical costs and benefits of retrofitting.

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?

The policy needs to be strengthened by greater insistence that measures will be implemented. Delete “should” and replace with “must”.

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

There is no harm in encouraging all appropriate “green” technologies but the Council must beware of “false” green initiatives, such as supporting the implementation of biomass wood-pellet burners which use imported wood pellets transported from half-way across the world.

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?

At the very least, the Council should set minimum targets.

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?

At a purely pragmatic level, there will have to be a recognition that retrofitting may not always be appropriate for some truly historic properties. Wiltshire has many listed buildings and other iconic non-listed properties. Rather than insisting on the retrofitting of sixteenth-century cottages, it is surely more important to concentrate on the implementation of high standards for all new development. If applications come forward for extensions and alterations to historic properties, then a conversation about carbon-friendly initiatives can be held at that time.

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?

Yes – the aspirations are good but the policy does not go far enough. Wiltshire Council has to recognise that it has to support improved provision of both quality Broadband infrastructure and the public transport network, if it really wants to achieve a reduction in the use of the private car.

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?

1. Insist on electric charging points in all new developments

2. Implement a policy of a minimum of 2 independently accessible parking places per new dwelling, in recognition that nearly every household does have more than one car and it is necessary to get those cars off the roads – then it will be feasible to –

3. Install traffic calming measures in all new developments to make driving uncomfortable; widen the pavements and make space for safer cycling.

4. Make more and better provision for cycle storage in Council owned public spaces; car parks etc. Liaise with the rail authorities to encourage better provision for bicycle storage. Liaise with the bus companies to ensure joined-up timetables for the buses and trains.

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?

Make land available for Distribution network and service operators to install electric charging points. Streamline the administrative process.

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?

This question is not written in English. However, if developers try to argue that scheme viability is threatened by requirements to build to zero-carbon standards, then refuse to grant planning permission. They will soon find ways of achieving the required standards.

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

Rep ID: Climate47	
Consultee code: General Public	Consultee Organisation (if applicable): Individual
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
It's not reasonable to even ask the question this way. You need to be much more proactive and say this is the baseline carbon calculation, zero is our target and then outline the action planning and monitoring process to get there. Given transport and residential and housing needs are such large carbon producers the local plan should be the means through which we deliver on this. In its present form it does not do this.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Ensuring housing stock is refitted, and that all developments are truly carbon neutral. You should be challenging developers and builders to demonstrate this or withdraw planning permission. Do not build on green field sites which will be needed for food, carbon capture, biodiversity, leisure and well being. Build on brownfield sites and Covid reuse sites. Do not build a cross flood plains.

A3: How should these actions be delivered and measured?

You should know the answer to this question if you had done you technical research. I have outlined above the baseline assessment, action plan and target setting that will need annual monitoring, but I am not an expert in this area. Green planning and build consultants, and people such as The Centre for Alternative Technology may be 'go to' people.

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

I cannot see how building on a flood plain is sustainable. For example in Chippenham where it would require an unreasonably high carbon cost to create bridges and viaducts to cross rivers and flood plains.

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?

I would suggest that by leaving the carbon in the ground and preserving enhancing our natural and biodiversity capital by rewilding would be a much better net gain.

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?

I don't see any of this being done at Birds Marsh development in Chippenham, which does not give me any confidence that you seriously intend to make all new build zero carbon. It would be great to see you implement these measures.

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?

Again you are not asking the right question. We have to do this for the sake of future generations. So please do not ask if not why not!

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It would cut the profits of developers and massive building companies, but we need to make it viable.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Through expecting the developers to provide a sinking fund for people to access grants for the needed improvements

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?

This sounds a good aspiration and if you achieve all this will be a positive step towards carbon zero. I do not have the expertise to comment further.

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

I think it should make assessments as to costs and benefits of all and use that to guide provision of alternative energies. Experts in the field would need consulting, and again The Centre for Alternative Technology may be of help here.

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?

I think it should set targets based on a roadmap to carbon zero by 2030

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?

Assessment of buildings would need to inform the use of a variety of of forms of energy use.

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?

We need to seriously tackle car use! We need to ensure communities become self contained and people live and work within their locality and are able to walk or cycle easily to work. So develop the local employment before considering housing!

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?

By not building dormitory developments on the edges of towns, such as the ones planned in Chippenham on sites 1 and 2. By looking to encourage and develop sufficient local employment before thinking of housing.

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?

They should discuss this with them over time as this looks likely to happen. However, I do think that as not all of us will be able to afford cars we need to plan for developing local employment and working from home in each locality.

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?

Property developers and large building companies may not be able to make such vast profits. It will not be viable to reasonable given the need to work towards zero carbon, to continue to build as we always have done. New imaginative housing schemes will

need to be looked at. Houses may need to be smaller and we may need to design housing communities to be able to take advantage of shared facilities rather than being such self contained units. I am not an expert but I am sure there are examples of new imaginative green schemes that we should be considering.

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

I read your document with enthusiasm. You clearly have made a good start on considering how we reach carbon zero by 2030. However I am disappointed to see that the actual area plans for Chippenham do not show much evident of this being acted on. It looks very dressed up and presented as green but when I watch what is going on on the Development of Birds Marsh, and I read of your further plans for the town I cannot see how they appear to be totally unreasonable in a time when we are supposed to be working towards carbon zero. There is no carbon calculation on the plans that I can see but they must be astronomical and it is totally unacceptable to build on such a vast amount of green field sites which should be conserved for food production, building biodiversity, carbon sink, and leisure and well being amenities for local people.

Rep ID: Climate48	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes if the Local Plan takes into consideration that the 2 highest areas for emissions are transport and residential buildings. This would indicate the importance of the Local Plan to ensure that all new builds are built to zero carbon standards and ensure that infrastructure for Public transport is utilised instead of new road building.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<ul style="list-style-type: none"> - Zero carbon housing standards at a minimum. - Encourage retrofitting and use of existing buildings instead of new build schemes. 	

- Inclusion of usable cycling lanes that take the rider safely from one place to another without use of roads as much as possible.
- Planning for local electricity generation facilities.
- Tree planting on flood plains to help reduce the impact of surface water.

A3: How should these actions be delivered and measured?

- Zero carbon housing standards at a minimum. - Not costly to adopt, builders will have to adapt, they have the money and ability to do so. Have an appointed person in the council to ensure that standards are met.
- Encourage retrofitting and use of existing buildings instead of new build schemes. - Subsidies for retrofitting and advice given to people on why it is important. Have an appointed representative whose job it is to go to local communities and inform them of the schemes available and give advice on how to do so. Landlords receive benefits if they retrofit their tenants' homes.
- Inclusion of usable cycling lanes that take the rider safely from one place to another without use of roads as much as possible. - Create a map outlining possible areas to have active travel routes and actively encourage people to get on board if there is a common route that would warrant a dedicated cycle lane. Look at areas where there have been accidents between cars and pedestrians or cyclists to find the dangerous areas that need to be looked at first. This would encourage more people to cycle if provided with a safe route.
- Planning for local electricity generation facilities. - Indicate the areas that would benefit from renewable energy, potentially focusing on the less affluent areas first as local energy production would likely lower their electricity bills.
- Tree planting on flood plains to help reduce the impact of surface water. - Target X trees to be planted in X timescale and encourage the whole community to take part in planting.

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

Yes and no, we need to be attempting to reduce the amount the sea level rises and increased rainfall as well as just future protecting for when it does. New development should not be designed for flood risk areas as this would leave people with homes that are not covered by insurance when it floods. This will be devastating for people's lives, instead of building on flood plains we should be planting trees (and leaving them in the ground) to help mitigate the impact of flooding in those areas.

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?

I would like to see areas which is rich in wildlife to be protected against new building projects and only permitted on areas that do not benefit nature and local wildlife. All new buildings should be kind to the environment and proactively show how their buildings meet required GBI standards, not just a tick box exercise.

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?

I believe so, I am not very knowledgeable on sustainable house construction but it would be good to see renewable energy being used in new builds as opposed to non-renewables. Solar panels will also help to keep peoples utility bills down.

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?

Anything is possible if we put our minds, enough effort and money into it. This has been proven with the fast moving pace we have all jumped to arms in the recent pandemic. It should not be a case of 'if we can' it should be 'how do we make this work'. Start in 2023 (or beyond) and work backwards to detail the steps needed in order to achieve the goals set out. This is the best and possibly only opportunity to build ourselves a better more sustainable future. We shouldn't let a bit of hard work put us off and keep us stuck in the same archaic polluting ways.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not at all. It would improve the scheme and our futures.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Unsure, whichever is more all encompassing and checks that performance standards are met and not just box ticking.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Subsidies for retrofitting, promotion of the scheme thorough channels other than own website e.g. local media, social media and local groups mailing lists. The council should hold various meetings with local groups, landlords, letting agents and property owners to promote the scheme and why it would benefit them and their tennents to retrofit. A massive campaign and set targets of what percentage of local area they would like to have adopt the retrofitting scheme even possibly hire people with sales skills to push out knowledge and adoption of the scheme further.

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?

It would be good if local renewable energy providers were able to sell any surplus back to the community I believe a change in government policy would be required to enable this to happen.

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

If they have scientific knowledge of which would be a better solution for the area and is the 'best' option for green energy in that area then they should be able to set policies to favour particular technologies, however not one size fits all so if there is no scientific background behind their reasons for favouring one over the other then it should encourage all green especially if the alternative is fossil fuel dependent.

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?

Yes, this is important as we will need to be reliant on renewable energy if we are to become zero carbon in the county by 2030 which is only 7 years away from when the plan is to be put into place. The local plan needs to be thinking far into the future with sustainable resolutions in the forefront of the plan. All houses to be using renewable energy by X date whether that is from the grid or produced locally on solar panels or wind farms.

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?

Conservation areas should have nature friendly zero carbon solutions such as solar panels and environmentally friendly materials used, Listed buildings should prioritise standards over their aesthetics. There are solutions available e.g. houses can get double glazing by merely having an internal frame, if the changes are not visible e.g solar panel to a roof this should be allowed to ensure the longevity of the building.

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?

I believe so.

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?

1. Stop building new roads.
2. Improve public transport quality, prices, routes and times.
3. New well planned out cycle lanes that are set apart from road use for the health and safety of the cyclist.
4. subsidies for those who adopt greener travel and possibly additional tax for those who don't.
Challenges might be people who want to keep using their personal cars for all journeys long and short but education should help people overcome this.

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?

Locally supplied electricity generation.

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?

It will future proof the scheme and ensure its longevity by ensuring a sustainable future.

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

Rep ID: Climate49

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I do not have the technical or policy expertise to answer the questions in this consultation. However, I strongly support the content of the paper and the fact that Wiltshire is taking these issues seriously. I believe there would be strong public support for radical action in this area. There is no option but to make sure we find solutions that will start to rapidly decrease emissions. I would like to see this recognised more strongly and put at the heart of the entire local plan.

Rep ID: Climate50	
Consultee code: General Public	Consultee Organisation (if applicable): Wiltshire and Chippenham Cllr
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
They absolutely have to.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
All homes built must be net zero carbon in construction and use.	
A3: How should these actions be delivered and measured?	

Assurance at planning, construction and baked into future planning permissions / permitted development.

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

Add:

- Do not build on or adjacent to flood plains.
- SuDS standards need to endure after not just during development.

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?

Green / blue infrastructure will be irrevocably damaged if towns continue to expand out and out. Donutting dormitories as in the spatial strategy cannot enhance Wiltshire's natural capital.

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?

Wiltshire Council declared a climate emergency two years ago, therefore the Local Plan must deliver a net zero carbon through sustainable design and construction; developers will need to deliver this and find innovative ways to ensure developments are viable. Please include renewable energy (solar and wind) and heat production in all considerations of land use.

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?

It has to be. We have declared a climate emergency.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Assessment at planning; assurance at design and build.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Leverage through Council tax - for example a reduction where there is evidence of investment in reducing carbon emissions? This could work for Housing Associations? And the Council should prioritise doing this for properties that it owns.

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?

We need much more investment in wind generated energy.

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

All technologies with the exception of nuclear.

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?

Ultimately production will need to match use.

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?

We may need to become a little less squeamish about adding renewable energy production, insulation and heat production technologies to conservation and listed buildings; and consider how modifications could be improved in future.

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?

People will only use public transport if it is cheap, frequent and runs early and late in the day. Given the high level that we already have of out-commuting and Wiltshire Council's apparent desire to turn Wiltshire into a patchwork of dormitories; we'll have to

invest in more train stations - Devizes Gateway, Corsham and potentially Hullavington and Royal Wootton Bassett. If we keep building roads people will buy cars and drive on them.

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?

Also consider the use of hydrogen fuelled transport - cars and buses.

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?

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?

We have a climate emergency; therefore there is no option but to achieve carbon zero. If the design and viability of schemes appears to be challenging we'll have to deal with it.

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

Rep ID: Climate51	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Wessex Rivers Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes - the Local Plan should provide a clear framework for investors and stakeholders in the county to work with nature to address climate change, including carbon emissions.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Working with and not against nature must sit at the heart of the Local Plan's approach to address carbon emissions and the wider impacts of climate change.	

Nature Based Solutions must therefore be promoted throughout the different elements of the local plan. Nature Based Solutions can offer so much more than costly hard/grey engineering alternatives, such as helping us to address the wider needs of our communities and nature, including reducing flooding, benefits for biodiversity (contributing towards net gain targets), and access to nature (excellent for people's health and wellbeing) to name a few.

The local plan should highlight these ecosystem services as positive opportunities for businesses (e.g. developers and local industry) to invest in nature, helping Wiltshire and their own companies achieve their carbon emission targets.

The local plan must look beyond tree planting as the sole method for addressing carbon emissions. It must recognise and promote the various opportunities around natural re-generation of woodland, wetland habitat and river floodplain restoration to name a few.

A3: How should these actions be delivered and measured?

Work with partners and local communities to identify areas and approaches for implementing nature based solutions on the ground. A natural capital based approach can be used to measure the outcomes of nature based solutions employed in the catchment.

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

In order to effectively deliver both flood risk management and wider climate change based targets (including biodiversity), development within the floodplain of rivers should no longer be permitted. Floodplains are an essential source of storage for floodwater (therefore reducing flood risk downstream) and carbon sequestration.

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?

Development should be ambitious, and held to account by the most stringent methods to ensure high quality, well considered nature based solutions are implemented with the consultation of the local communities and stakeholders affected, including long term management.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate52	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Wiltshire Wildlife Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

Thank you for the opportunity to comment on the Wiltshire Local Plan Review. We wish offer observations on the paper 'Addressing Climate Change and Biodiversity Net Gain'. Sadly, we feel that the paper fails to address the ecological crisis and threats to biodiversity. The objective to protect and create Green Infrastructure (GI) exists in Core Policy 52 and we recognise that the Council's emerging GBI Strategy will discuss this in more detail. However, this paper for the Local Plan should do more than simply signpost to this emerging strategy. It is very disappointing to see that this paper largely excludes discussion of the ecological crisis. The title of the paper suggests an equal consideration of climate change and biodiversity. Such an approach we welcome – the climate and ecological crises are inextricably linked. Indeed there can be no solution to the climate emergency without tackling the ecological crisis. A search of the 81 page paper for terms relating to biodiversity and ecology quickly shows how unbalanced this document is.

The recognition of climate change and the challenges it poses are welcome. However, the strong focus on carbon, the climate emergency and the term “biodiversity net gain” sets the wrong tone and prevents thorough examination of viable solutions to the ecological crisis. Climate change mitigation and biodiversity net gain are only two of many possible delivery mechanisms. There should be a much more holistic approach to exploring Nature Based Solutions; these will not only help the county respond to climate change but will also support nature’s recovery within Wiltshire.

Future land-use plans must discuss their role in tackling the ecological crisis and nature’s recovery as well as climate change. The plans and policies must be more ambitious, expand their scope and go further than simply mention “Protecting the natural environment...” (section 3.7). This paper should really set the scene for the interconnected landscape approach of the Nature Recovery Strategies that have emerged in the Environment Bill, and build a policy framework within which to coordinate viable and meaningful conservation efforts to address the ecological crisis.

Including the discussion of biodiversity and the ecological crisis within the context of Green Infrastructure fails to recognise the scale of the issue. Biodiversity net gain and the provision of 'wilder' green spaces within the built environment will provide a crucial link for wildlife to live in and move across our landscape and these measures will be an important part of the emerging Nature Recovery Network. However, to truly reverse the ecological crisis and tackle climate change, biodiversity and the natural environment must not be considered as a sub-element of a policy theme. These issues cannot be addressed in a piecemeal manner. In addition to the landscape scale concept of a nature recovery network, to truly deliver gains for biodiversity there must also be more detailed consideration of other important aspects, for example quiet spaces and refuge areas for wildlife, where disturbance from public access is reduced and the more sensitive species and habitats can thrive.

We would like to see the title of the paper 'Addressing Climate Change and Biodiversity Net Gain' changed, with the removal of the term "Biodiversity Net Gain". If this is to be a combined strategy, the focus should reflect this fully and the title and content of the paper should focus on "Natures Recovery".

It is not sufficient to leave detailed discussion of biodiversity to the GBI Strategy. There should be an additional policy theme of Natures Recovery outlining the range of mechanisms, which include biodiversity net gain and climate change mitigation, which can be used to tackle the ecological crisis.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

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Rep ID: Climate53	
Consultee code: General Public	Consultee Organisation (if applicable): Personal
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
YES if plans have force, are accepted by policy makers, developers and the local community as valid and sustainable and not just a rubber stamp.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Use criteria from the UN, EU and any and all organisations which are accepted experts to establish what can be achieved on reducing carbon emissions. This can be done if there is political will.	

A3: How should these actions be delivered and measured?

YES and urgently

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

I am not an expert here but they look detailed.

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?

I am not an expert here but they look detailed. I would want to shift the 10% biodiversity gain to 25%

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?

I am not an expert here but they look detailed. The environmental standards on houses have been cut in recent years and are likely to be cut further to pander to the power of developers - we need to return to the highest international standards possible - or even better - it is not if these are good enough they **MUST** be and even better. Does the council have the political will to ensure they happen rather than allowing developers to use their power to prevent it.

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?

YES - it must happen

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

I am not an expert ~ how would I know this?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The environmental standards on houses have been cut in recent years and are likely to be cut further to pander to the power of developers - we need to return to the highest international standards possible - or even better - it is not if these are good enough they MUST be and even better. Does the council have the political will to ensure they happen rather than allowing developers to use their power to prevent it.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Get on with it - demand funds from developers and the government to make it happen = jobs and new businesses for the future. Climate change demands this.

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?

I am not an expert here - they sound appropriate but they will only work with local consultation, accountability and the will to make them happen.

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

All technologies.

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?

YES - 100% Local accountability

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?

The council gets funds from developers and the government and does it.

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?

I am not an expert here - they sound appropriate but they will only work with local consultation, accountability and the will to make them happen.

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?

Cheap, green, electric, regular rural transport. Create the market and it will happen

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?

Government funding, developers be mandated to include them in all new estates, encourage community groups to be involved.

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?

I am not an expert here - the council needs to pressure government on this issue - there needs to be a massive change in people's expectations about housing, building and construction. This can happen but there needs to be a real will to make it happen - does the council have this?

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

No thank you. Good questions.

Rep ID: Climate54	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The current Local Plan under consultation for Chippenham goes against the climate change objectives, building 5,000 houses over the Government figures with no evidence. Building distributor roads for these 5,000 houses that need the longest bridges in Wiltshire, building all the houses in the first half of the Local Plan 30 year span at below net zero standards as the policy aren't in place yet for developers to have to adhere to them. The local plan ignores the central area brownfield sites which would provide central housing within close proximity of the train station, bus station and local amenities reducing the need for cars and instead concentrates on destroying existing County Farms owned by Wiltshire Council, prime farmland required for local food, The proposed sites require cars as it is not practical as suggested to cycle to work for many, arriving sweaty and disheveled with no opportunity to shower or change after carrying additional sets of clothes and cycle helmets is not practical for many. The local plan has the chance to make a difference but not in it's current state. Wiltshire Council do not know how many houses have</p>	

been built since 2019 in Wiltshire, how can you know you need to destroy existing valuable County Farms with prime farmland which has been in use and has history going back to 1781 when you haven't got this information?

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

Use brownfield sites, be business led not keep building houses and not attracting business so you have 67% out commuting in Chippenham and 37 business premises of all sizes and plots available on one website. Chippenham has been given 20% of the houses for the whole of Wiltshire which is not sustainable dropping all these houses in one place. Ensure they wait until houses can be built at net zero, CPRE says Wiltshire have overbuilt by 40% so far in the Local Plan period so we have time to re-evaluate rather than rush and make mistakes and have substandard houses taking us forward. Not destroy our local prime farmland that lines the 7 mile cycle path off road to the next plan by covering the area with houses so instead of being able to enjoy health and wellbeing with no carbon footprint, we will have to get in our cars to drive through the excessive building to get to the countryside causing a carbon footprint when we should be reducing it.

A3: How should these actions be delivered and measured?

They can be measured by the amount of brownfield sites that are built on, at the moment we have clean brownfield sites left derelict for over 6 years in prime locations because the developers are given greenfield sites which they can make more money on. They can be measured by the number of net zero houses built. The percentage of food grown and consumed locally reducing carbon footprint compared to imported food with high carbon footprint from packaging and food miles by plane and road. Carbon emissions should be monitored eg how many tonnes of carbon will be created building the longest concrete bridge in Wiltshire when not needed.

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

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?

No, what the local plan is going to destroy for the wildlife, habitat, County Farms owned by Wiltshire Council for local food, community and residents of Chippenham should be a criminal offense when brownfield sites are available.

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?

They would if they included the average struggling family whether in rented or mortgaged properties to have grants, the previous green grants didn't include solar panels and didn't include replacing worn out double glazed windows, only single glazed. This would help with reducing their energy bills but they haven't got the money for the initial outlay meaning the rich/poor divide gets bigger.

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?

It will be achievable if the government put the policies in place with no loop holes for developers.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No because of the 40% above target houses already built we have time for a break until the policies are in place.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I haven't read the above documents so need the experts to do this, we need every available item included eg solar panels, water collection, insulation, latest heating systems, triple glazed windows etc. Rather than relying on large developments we need Brownfield developments by local builders to have the skills and innovation through apprentices to grow and delivery these houses while we have this bank of an extra 40% of houses over requirements.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Expanding the green grants to include solar panels and replacing worn out double glazed windows. These needs to be for rented and mortgaged properties when salaries are below average.

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?

They will go far enough if existing residents in rented and mortgaged properties on below average salaries are assisted. We currently have people on benefits getting everything and people struggling on low incomes just above the thresholds ignored.

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

This should be adaptable as new technologies are developed.

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?

It is easy to measure the energy credited by solar panels, a comparison would need to be taken at the start and end of the period of percentages of energy from various sources.

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?

Concentrate on the quick fix properties first and allow better technologies to be developed for conservation and listed buildings.

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?

The Local Plan and current actions by Wiltshire Council go against the above. Words and actions have to be the same. We have seen the special school in Chippenham planned for closure as with 2 other towns and then a megaschool created, bad for the pupils and environment with so many having to travel. This is happening now, and goes against the above, it is very misleading. Destroying County Farms owned by Wiltshire Council which could be used for local food and innovation when we are told to be more self contained goes against the above? Forcing us into cars for the countryside due to excessive building in one place goes against the above. We also have the poor/rich divide on electric cars, many people can't afford to change to electric cars. Bus services need to be updated and adaptable to meet the modern needs. Schemes like Dysons where they provide a work bus need to be encouraged and supported.

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?

It needs to be adaptable and modern with financial help for those struggling to buy electric cars.

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?

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?

It will be a chance for smaller innovative builders to get involved and involve local development by local people providing local jobs and apprentices, profit will be put back into the local community.

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

Please do not destroy the very ethos of Chippenham with excessive building in one town when we have already provided our share. Thank you

Rep ID: Climate55	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
As a planet we have to move to net zero emissions by 2050 to avoid catastrophic climate change. Countries with significant historic emissions as well as relatively high current emissions such as the UK need to move significantly faster than that. It is not reasonable to assume we can move more slowly towards these targets.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
All new buildings should be designed with a high degree of insulation and low demand for energy for heating and/or cooling. They should be constructed from low energy-demanding materials as far as possible. They should not be connected to the fossil	

fuel grid. They should be connected to local services etc by sustainable transport links - cycle lanes, pavements, bus routes. Additional space for motor vehicles should be limited. Retro-fitting of existing buildings with good insulation and fossil fuel-free energy supplies should be a priority.

There should be no new roads built or increase in road capacity unless it is to incorporate cycle and/or bus lanes. It is vital that road traffic reduces and well-documented that more roads = more traffic.

Allocation of sites for renewable energy generation (primarily solar unless there is a shift to other sources because of improvements in technologies) and storage.

Local sourcing of food and other essentials is important in reducing global carbon footprints and in building local resilience in facing disruption of supplies from elsewhere due to extreme weather events. Consideration should be given to how dependent Wiltshire is on external supplies and how self sufficiency could be improved.

A3: How should these actions be delivered and measured?

Energy use for heating, lighting etc by domestic and business properties could be captured and monitored. There should be targets for reducing energy use overall, particularly as existing buildings are insulated. Use of fossil fuels as an energy source should be eliminated. This could also be measured by e.g. the number of houses using a gas boiler.

Additional data could also be captured on how much renewable energy is being generated in the county.

I presume Wiltshire Council already monitors traffic levels and use of council car parks to some extent. COGS do some monitoring of cycle use in Salisbury - this scheme could be extended.

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

I don't know enough about this to comment. I agree support the proposals

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?

I would like to see significant effort in enhancing green/blue infrastructure and biodiversity as specific projects in their own right, not necessarily tied to new development.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

New development schemes that are not zero carbon will affect viability of life on earth. There should be minimal, if any, get out clauses for developers. We have to make new development make as little impact on the planet as possible from now on. There has been plenty of warning, time to see this coming. Unfortunately we have been much too slow to respond so now our response has to be immediate and comprehensive.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I don't know enough about building regs to be specific. I do know that the council reduced the requirements in a previous plan - a hugely detrimental step. The regulations adopted should be the best available in terms of addressing climate change.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Promoting (training?) a well-qualified workforce to undertake renovations. Monitoring roll out - maybe even promoting a street by street approach. Ensuring it is affordable for all.

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?

I don't feel qualified to comment on this. I support the measures you list.

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

All technologies should be encouraged although I'm not sure there is much potential for wind or hydro power.

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?

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?

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?

I would like to see more measures to encourage the modal shift from private car to active transport. Car-free residential zones should be included in all new developments as well as good, safe active travel routes to central amenities. In Salisbury we have an excellent community car scheme that could be promoted, especially on new developments, so that personal car ownership is not seen as essential or economically attractive. Car-free developments could include a small parking area outside the residential zone with one or more community vehicles. City / town centres should be free of through traffic- People Friendly Streets should be resurrected in Salisbury and the road improvements outlined in the local transport plan should only take place if through traffic is banned from the city centre. While it is difficult to imagine all of those coming to the county's larger settlements from rural areas to be using active transport or a frequent and convenient public transport system, they should be discouraged from driving into the centres and have stronger incentives to use park and ride.

I find the funding levels for road improvements (£213 million) vs measures to support active travel (£31.7 million) and public transport (£10.5 million) indicate a lack of ambition when it comes to achieving modal shift and demonstrate the wrong priorities.

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?

See above. I am more in favour of reducing the amount of traffic than envisioning a wholesale shift to electric vehicles, if that was even possible.

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?

I don't see electric vehicles as the answer. It will not be possible to increase the production of electric vehicles significantly unless there are ways to run them that don't depend on sourcing rare earth metals etc. Having the power to run them should not mean that there is significantly less power to do (other) essential tasks.

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?

I don't feel able to comment on this

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

Rep ID: Climate56	
Consultee code: General Public	Consultee Organisation (if applicable): Wiltshire resident
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I object to solar farms taking over green belt land. There has been a large increase in solar farms in Wiltshire (and other areas) and their benefits in the UK climate are suspect at best. They are not the correct solution and seek to make the companies a quick profit with limited benefit to the community. Providing incentives for adoption of solar panels on domestic roofs (existing and new build) is the way to go without ruining vast swathes of beautiful countryside. Clearly the climate emergency is important to address, but not with solar farms.

Rep ID: Climate57	
Consultee code: General Public	Consultee Organisation (if applicable): n/a
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
My interpretation leads me not to assume that these outcomes will be delivered.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
The wording of the Consultation suggests to me that there has been a lot of well-intentioned planning, and many ideas working toward reducing carbon emissions, yet no firm commitments of action. One of the pie charts doesn't even add up!	

A3: How should these actions be delivered and measured?

I am not sure what actual 'actions' are taking place.

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

I don't feel that I am qualified to answer this.

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?

I am not able to say, based on the above.

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?

As an example, "All new development should seek to reduce, recycle and reuse construction waste" does not specify exactly what will take place. That the development "should seek" implies that they might take a look, but not implement. I can't therefore say that the measures go far enough.

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?

It will be achievable only if it is legislation presumably.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

I would be interested to hear what housing developers feel with regard to zero carbon housing schemes affecting their profitability.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I am not familiar with Building Regulations, but I hope that they are up to date with current design possibilities for carbon neutral, sustainable buildings.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It's not my area of expertise, however, I should be interested to know what the options are.

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?

The wording describes what we 'should' do, but unless there are more specific objectives, I am not able to say whether it goes far enough.

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

I think all technologies should be considered as long as they don't result in any activities that are detrimental to the county.

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?

Yes, I believe that targets provide a useful focus.

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?

I am not qualified to comment on the nature of alternative energy generating technologies.

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?

I am not able to say whether "will likely need to set out policies" is sufficient.

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?

Clearly there must be an increase in electric charging points if we want to encourage electric vehicles, but I am not familiar with what planning consent is required for this.

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?

I do not know enough about the electricity grid.

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?

I am not sure what this question means.

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

I feel disappointed that I have been unable to better respond to the questions in this consultation. There seem to be a number of general questions, yet the answers require considerable knowledge in areas that I do not have. I based my answers mainly on the first part of the Local Plan consultation paper, in itself a lot to take in across the 75 pages. I found the detailed information in Appendix 1 Climate Change Policy Analysis – WCS Policies (a) and other exemplar Local Plans Policies (b) Appendix 1 very difficult to both read and absorb. I feel that my lack of technical knowledge prevents me from actively contributing to a Consultation that concerns myself and my family. The Appendix, in my opinion, is not designed for the general

Wiltshire residents. Whilst the proposals for carbon reduction are extremely valid, many are non-specific, and if Corsham is a typical example, these proposals have not been fed down through to the Local City and Town Plans, where the recommendations must be assessed and actioned and tracked.

Rep ID: Climate58	
Consultee code: General Public	Consultee Organisation (if applicable): NDP Steering Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>It is ambitious but achievable with the right policies. Although not all measures may be popular at first, the reasons to implement such policies are urgent and undeniable. I think most will see the necessity of reversing existing carbon emissions by 2030. Many like myself have embraced recycling, a reduction in plastic use , the need to reduce food waste and are willing to undertake whatever measures we practically can to protect our wildlife and environment and reduce carbon emissions. Where there's a will there's a way!</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Improve Public Transport and the way it is powered, encourage electric cars and install charging points, provide more cycle lanes and footpaths, not necessarily sharing the same space, provide solar panels at reduced cost. Do not grant planning permission to the proposed incinerator in Westbury. Encourage more rail freight traffic where possible to reduce HGVs on our roads. Encourage electric heating in homes and discourage wood burners and gas powered heating, I'm sure someone will come up with a far more realistic electric fire! Encourage and enable more working from home or near to home to reduce car journeys.

A3: How should these actions be delivered and measured?

Make sure all are aware of the reasons behind new policies and the importance of making these changes. Involve our communities and get them 'on board', make them part of the solution not part of the problem. Make the population enthused and willing to find answers to problems, young people are already leading the way - it's their future that's at stake. How can these actions be measured? Perhaps by the numbers of cars on our roads and the numbers of electric vehicles. The air quality, (I requested a ND tube sited in Southwick two years ago and it will continue to monitor the air on Wynsome Street during 2021.)

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

Hopefully yes they will. I live in an area subject to surface water and river flooding from the Lambrok waterway. careful monitoring is crucial. whenever there is heavy rain fall and the ground becomes saturated the threat of flooding becomes more of a risk. on occasions we see fields that were recently considered for development in Flood zone 1 are increasingly suffering from surface water flooding and it happens more often than in the past. The Lambrok runs throughout Southwick and its extensive floodplains are known to have been used for irrigation from medieval times. The clay soil in this region has always suffered from surface water flooding and climate change makes this more likely. I monitor the river levels and as Southwick's representative send photographic evidence of flooding to the Operational Flood Working Group.

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?

I would support these measures of creating new GBI infrastructure and Biodiversity and feel they could provide considerably benefits to wildlife habitats and to our health and well being. But wildlife here must be adequately protected and managed by those properly qualified in the care of wildlife. Adequate buffer zones should be planted to protect wildlife habitats from small children and pet dogs and cats from nearby developments. Many animals found here such as otters water voles bats and birds are protected species.

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?

Yes, if these measures were adhered to and all new homes were required to follow the policies and could achieve zero carbon rating. As much as is viable and practicable support should be given to decarbonising and modifying existing Buildings. I would think many would be willing to add solar panels to the roofs of residential and commercial buildings if cost effective. Introducing Electric Charging Points would encourage many to consider an electric car, at present there is a fear of not finding a EV charging point when need.

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?

If it is possible to achieve this from 2023 then measures must be taken to ensure all new development is zero carbon rated. This is too important for half measures

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Possibly at first, but there will always be someone ready to find a better, more cost effective ways to achieve zero carbon development if it were advantageous to them. Necessity is the mother of invention.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I'm not qualified to answer this except to say when enough well qualified minds consider this the right methods of achieving the best solution will emerge.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Perhaps by offering information and financial contributions for those wishing to install solar panels, heat pumps etc. or to change to electric heating methods.

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?

These measures seem pretty comprehensive. I know I would be happy to consider them in an effort to improve my carbon footprint. I'm sure Southwick's Neighborhood Plan would be happy to consider any measures to improve carbon neutrality in any future developments.

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

Encourage all technologies to provide green energy in Wiltshire. The more parties who come to the table the more answers will be found.

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?

Solar farms already exist, wind turbines could be an answer where not too obtrusive but solar panels on roofs would seem to be a more easily targeted and easily measured goal.

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?

All steps should be taken and ways will be found to incorporate this technology into buildings in sensitive locations.

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?

These measures should be enough if properly and extensively implemented.

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?

Private cars will continue to be the choice for the majority of households so accelerating the roll-out of EV charging points in existing building stock would seem to be the way to encourage more to shift to electric cars. Improving the bus service and the way it is delivered would encourage more to use it.

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?

I don't know I'm afraid.

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?

There will I imagine be impacts on design and viability but these can be overcome.

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

We have to succeed with these measures one way or another , there really is no alternative!

Rep ID: Climate59	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Marlborough Area Neighbourhood Plan (MANP)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The MANP Steering Group is not qualified to answer some technical questions in this consultation, but has addressed mitigating Climate Change and biodiversity net gain through 2 policies in its draft Neighbourhood Plan (Pre-Submission Document): MARL20 – Mitigating Climate Change: New Buildings MARL21 – Mitigating Climate Change: Carbon Sinking This form cannot accommodate our the above polices but can be downloaded or viewed at: https://www.marlborough-tc.gov.uk/images/Neighbourhood_Plan/MANP_Pre-Sub_November_2020_Final.pdf</p>	

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

This is a difficult proposal for the Marlborough Neighbourhood Area (Marlborough with Manton, Mildenhall and Savernake) which has numerous listed buildings and where heritage is hugely important. It will need handling with real sensitivity. There are conservation areas in Marlborough, Manton and Savernake. The Pre-Submission document deals with heritage via the following policies:

- MARL10 – Enhancing Marlborough Conservation Area
- MARL11 – Enhancing Marlborough Areas of Special Quality
- MARL12 - Enhancing Manton Conservation Area
- MARL13 – Enhancing Mildenhall Conservation Area
- MARL14 - Enhancing Local Heritage Assets

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?

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?

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?

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?

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

Rep ID: Climate60	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Marlborough Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The key word throughout is “viable”. Funding must be made available/lobbied for to achieve a lot of these outcomes. Financial incentives and penalties must be in place to steer developers towards sustainable development and away from “business as usual”.</p> <p>Furthermore, looking at land-use in isolation without being able to jointly consider transport is pointless. They both directly affect each other and many of the outcomes will not be achieved without a complete reinvestment in bus provision across the county, as one example.</p> <p>Change “significantly reverse” into “eliminate” to be consistent with 2030 target.</p>	

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

The Local Plan team should be consulting with as many local experts as possible, for example the recommendations made by the Global Warming and Climate Emergency Scrutiny Task Group in their report from 13th Jan 2021. Buildings account for 53% of Wiltshire emissions and we know how to tackle the heating part of this—insulation. WC should concentrate on its own buildings and on social housing to begin with. EV charging for residents without off-road parking also needs to be considered. Finally, we should be encouraging green tourism (e-bikes, good quality charging for Londoners on their way to Cornwall and so on) as a way to reinvigorate our High Streets. For Marlborough, a joined up, regular and reliable bus service that links with Devizes, and the stations in Pewsey and Bedwyn, would have an impact on car use. Ensuring good links from new developments to town centres to promote walking and cycling is key. Greater consideration is given to the greening of the built environment to include ‘living walls’ which soak up pollutants, the planting of more trees.

A3: How should these actions be delivered and measured?

Regular SCATTER analyses to track changes to emissions. There are national funds available for retrofitting existing housing stock but these are not being taken up because it is too difficult for building firms to become accredited. WC should assist Wiltshire businesses to become accredited and then use the Government funds to improve social housing etc. Measuring success would be easy - number of accredited firms and number of insulated houses.

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

We support and encourage the measures described, however phrases like “should” “support” and “where technically feasible” mean that these measures hold no weight. The measures have the potential to go far enough, if they are made more robust, e.g instead of “where technically feasible, developments should...”, state “developments must demonstrate...”

There should be clear incentives for adhering to these measures, and clear penalties if they are not adhered to, e.g presumptions against developments that do not design in sustainable water use. If water efficiency is not factored into new development from the outset, it is so much harder to retrofit. Every time we make a change to land use, more impermeable surfaces are created. Natural flood protection comes last but should be the most emphasised approach. It’s cheap, soaks up carbon and promotes biodiversity. It also prevents flood-prone lands being used for building on if it’s already in use as flood protection.

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?

Again, use of “should” means these measures hold little weight.

Very supportive of the proposal that developments should not just avoid net-harm but, instead, actually increase biodiversity by 10%. WC should be praised for this ambition.

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?

Again, use of “should” means these measures hold little weight. There is a lack of detail in how these measures would be supported, or expected to be implemented, or which other bodies would be responsible for creating more detail, e.g Neighbourhood Plans. The Marlborough Area Neighbourhood Plan are working towards a design philosophy which embodies Passivhaus practices. The council need to implement a baseline design brief to include insulation, water capture etc. We would support the Council using a framework similar to the UK Green Building Council.

How does the council expect developers to reduce, reuse and recycle construction waste and is the council planning on changing its waste management services to support this?

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?

It would be achievable if the Council could guarantee and specify its level of support.
Incentives must be made available to developers or zero carbon new developments will simply not be achievable.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not necessarily, but developer profit margins should not be the deciding factor in viability.
Challenge/expand definition of viable to include the environment, not just financial viability.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Marlborough Area Neighbourhood Plan supports Passivhaus standards.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Start with schemes to insulate social housing and to replace oil-fired boilers with heat-pumps (NB this will only work if the houses are well insulated first). Accreditation of local companies (see A3). Funding is already in place in the form of the Green Homes Grant, but it is not a simple process and accreditation for businesses is hard to achieve. Support needs to be given to facilitate and speed up this process.

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?

“positive policy approach” - does this mean a presumption in favour of sustainable developments and a presumption against unsustainable ones?

Energy policy must include investigation of energy storage. Without energy storage we cannot increase renewable energy much further without suffering frequency-instability and supply-security issues. Battery storage helps with short-term (seconds to hours) issues but is too expensive for longer-term (hours to weeks) issues. Energy storage is therefore going to be big business and an essential component of the energy transition. Wiltshire may be able to contribute through, for example, pumped-hydro storage schemes. Are there any suitable locations in our county?

Consideration should be given to community energy schemes, whereby local area resources are handled locally.

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

The Local Plan team should be consulting with as many local experts as possible, for example the recommendations made by the Global Warming and Climate Emergency Scrutiny Task Group in their report from 13th Jan 2021.

Don't pick winners. Encourage a mix. The best technologies today will be the worst next week. We mustn't discount anything however we do need to consider and understand the impacts of all.

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?

Yes, targets are essential to measure success. The council should consult with local experts as to the best ways of measuring these.

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?

Sensitive locations could be prioritised for receiving off-site sustainable energy production e.g local solar farms, while non sensitive buildings and sites could be retrofitted directly.
Conservation areas and listed buildings should concentrate on unobtrusive energy efficiency measures (insulation again).
Remaining energy needs can be supplied from the grid.

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?

Whilst the AQA's are effective in terms of monitoring and generating statistics, are they effective on the ground?
We should encourage use of e-bikes. These are game-changing. There's a reason why almost everyone cycles in Cambridge and hardly anyone does in Wiltshire—Hills. E-bikes change this and make cycling much more widely accessible in almost any area. Furthermore, once we have the facilities, I am convinced that e-biking could become a source of significant tourism income for the area in a similar way that conventional biking attracts thousands of people into the New Forest. Mostly, this just needs the

same facilities as normal biking, i.e. good routes and secure parking (sheltered if possible) but it could also be encouraged by supporting local businesses to provide e-bikes for rent. Again, bike-rental is a high-earning business in the New Forest.

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?

Significant investment in bus services is essential. For Marlborough, a joined up, regular and reliable bus service that links with Devizes, and the stations in Pewsey and Bedwyn, would have an impact on car use. Ensuring good links from new developments to town centres to promote walking and cycling. Can WC make some of the prime parking spots in our town centres available to EV charging companies (in return for a portion of the income). With petrol engines being phased out, those towns which get an early reputation as reliable places to “fill up” and get a cup of coffee will prosper. Consideration should be given also to EV charging points in residential areas of the town as many residents of the town do not have off-street parking.

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?

The Local Plan team should be consulting with as many local experts as possible, for example the recommendations made by the Global Warming and Climate Emergency Scrutiny Task Group in their report from 13th Jan 2021. WC need to talk with the distribution operators to try and resolve the issue of single point failures in the distribution system. Some 13 or so years ago, a gas cable was cut near Hungerford cutting off the gas supply to Marlborough. As there was no gas, residents all switched to electricity to power and heat their homes which put a massive strain on the provision of this service.

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?

Again, redefine viability to include sustainability not just financial interests. Sustainability can be factored into new builds without impacting on the design. Incentivise and penalise.

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

Marlborough Town Council endorses the draft policies in the Marlborough Area Neighbourhood Plan:
Policy MARL20: Mitigating Climate Change – New Buildings
Policy MARL21: Mitigating Climate Change – Carbon Sinking
These cannot be accommodated on this form but can be viewed or downloaded at: https://www.marlborough-tc.gov.uk/images/Neighbourhood_Plan/MANP_Pre-Sub_November_2020_Final.pdf

Rep ID: Climate61	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
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B1: If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

There is a lot of potential for improving listed buildings, but existing government grants etc. have been aimed at "traditional" (ie more modern) properties. Enhanced levels of support are required to provide similar rates of return for improvements to listed properties.

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?

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

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?

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?

There is a lot of potential for improving listed buildings, but existing government grants etc. have been aimed at "traditional" (ie more modern) properties. Enhanced levels of support are required to provide similar rates of return for improvements to listed properties. For example the current "Green Homes" grants do not allow secondary glazing as a primary improvement but only double glazing. It is not easy (or probably even possible to obtain planning permission) to fit double glazing in a listed building. It would be expensive (fitting and planning) and time consuming. Similarly replacing existing heating with a heat pump would require planning for any external equipment. Higher levels of funding are required for listed buildings.

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?

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?

Moving away from "out of town" shopping to having retail outlets, recreation/hospitality facilities within walking distance of homes - how town centres used to work - would remove the much of the requirement for transport.

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?

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?

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

Rep ID: Climate62

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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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?

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?

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?

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

I would like to submit some general comments about Wiltshire's Local Plan:

We are in a Climate Emergency and face catastrophic consequences. The Climate Emergency is acknowledged by Wiltshire Council, the UK Government and most of the world.

The Local Plan covers a period up to 2036. This is the best opportunity for the Council to lay out its action plan to achieve its stated aim of reducing carbon emissions in Wiltshire to net zero by 2030. The National Planning Policy Framework requires Local Plans to 'take a proactive approach to mitigating and adapting to climate change in line with the Climate Change Act', This plan does not achieve this, nor does it go anywhere near achieving it. On the contrary, it is highly probable that the approach taken would significantly increase emissions. The plan does not include an assessment of how the proposed developments will affect carbon emissions, nor are emission impacts quantified in the spatial strategy.

Biodiversity and nature conservation are also not factored into policies included in the plan or the spatial strategy.

The number of houses included in the spatial strategy considerably exceeds even the Government target of 41,000, which itself is based on an out of date formula rather than on genuine local need. The Council for Protection of Rural England (CPRE) and others claim that the number of houses being built by Wiltshire is over and above the number needed in this County. The location of proposed housing developments would increase dependency on car use, with associated road building and transport emissions. There is an overwhelming emphasis on development on greenfield sites, with many negative consequences such as urban sprawl, diminishment of much-needed amenity land and destruction of habitat. Brownfield sites are not adequately considered in the plan, and should not be regarded as 'windfall' opportunities.

The Local Transport Plan is based on out-of-date projections of future traffic volumes. Major road schemes included in the plan should be re-assessed, taking into account local and national climate change policies and longer-term changes in work patterns.

In addition, the Local Plan should include:

- Calculations of Wiltshire's carbon footprint and the carbon emissions of proposed developments. Annual targets for the reduction of carbon emissions, with details of how this is to be achieved
- A shift to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles
- Plans for renewable energy generation, including wind power
- A requirement for housing and commercial developments to be built to zero carbon standards
- Strategies to increase biodiversity and carbon absorption of the natural environment, through measures such as tree planting and eco-friendly agricultural practices

In conclusion, I maintain that Wiltshire's current Local Plan is not fit for purpose and strongly submit that it should be withdrawn and completely rewritten in accordance with the planning guidance of Wiltshire Council's own Climate Emergency Task Force.

Rep ID: Climate63	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I would like to request that the Local Plan be completely rewritten, and that a policy framework is introduced that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth. As it stands, the Local Plan will not help Wiltshire to achieve Zero carbon by 2050, let alone 2030.

I find it astonishing that the documents treating transport and housing are devoid of any detailed carbon reduction targets, whilst building new roads is considered in great detail. It seems that the approaches outlined in the document "Addressing Climate Change and Biodiversity Net Gain" have been siloed in that document; in other words, it is not the worth the paper it's written on. I can only assume that elements of the Council's administration remain in denial about anthropogenic climate change.

Specifically, I call for planning policies that require new houses being built to Zero carbon standards, and a much greater emphasis on reducing car dependency in new developments.

If you need inspiration for a good Local Plan, have a look at the one for London:

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Rep ID: Climate64	
Consultee code: Other	Consultee Organisation (if applicable): Climate Friendly Bradford on Avon
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The Local Plan can make valuable contributions to reversing carbon emission trends in Wiltshire through policies on location of development and types of development, policies favouring public transport and cycling infrastructure over private car usage. Policies committing to tree planting and land management on its own land and on land being developed that favours carbon sequestration will make a positive impact on carbon emissions. These are just examples of what the Local Plan could achieve before 2030</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Set zero carbon targets for all new house-building including water use; stop new road-building and ensure house-building takes place on brownfield sites to protect open land for biodiversity, current and future food production, carbon sequestration and renewable energy production. These are achievable though they depart from recent and current Council policy.

A3: How should these actions be delivered and measured?

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

No. They are a good start, but no mention is made of tree planting. Tree cover reduces run off, stabilising soil and absorbing water, and should be encouraged in the flood plains. Farming practices need to change, as compaction and overuse of chemical fertilisers has led to loss of soil structure. The Local Plan itself may have limited powers to address these issues, but Wiltshire Council can play a role, and the Local Plan can acknowledge the need for action on this. Retaining its own farms as farms, and not selling them off for housing is one important way the Local Plan can address this.

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?

These standards should always form part of planning permission

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?

No. Wiltshire Council needs to set high standards for house construction now, even if the UK government has not yet done so. There are surely many local authorities already committed to doing this. The house-builders need to be brought up to see their role in moving towards carbon neutrality by 2030. If house builders are mandated to build houses to carbon neutral standards they would say it was too expensive but provided standards were the same for all of them, they would continue to build - they are making good profits and the houses would have lower energy costs and almost certainly then be easier to sell.

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?

See above. It may not be achievable from 2023, but that should be the goal, and intense lobbying of central government during the plan making process should be undertaken along with other local authorities.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

There is evidence that the initial costs of zero carbon housing is of the order of 5% additional costs. Given that running costs for the householder are reduced to near zero, this additional cost is not a long term burden for home owners. Given the requirement to address the climate emergency and given the high level of carbon emissions associated with our housing stock, addressing zero carbon in new development rather than increasing the burden for retrofitting should need no further justification.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

To achieve an uplift in the performance of new buildings, the Council should use whatever will best achieve this. Since the Council acknowledged a climate emergency, they can set higher standards than the current housing standards.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

There is a significant skill shortage in the area for retrofitting, and it is difficult for the householder to get impartial advice on what to do, given the diversity of our housing stock. The Council could work with local colleges to support the provision of training courses at a range of levels from school leaver upwards. The Council could look to providing clear simple guidance, drawn from expert sources such as the Centre for Sustainable Energy, on various technologies and their appropriateness for different housetypes and ages.

A register of local businesses that can offer services in eg air source heat pumps and insulation would also be helpful

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?

All new development should be required to install solar panels on roofs, and designed in a way to make this feasible. Airsource heat pumps are most effective when installed at construction stage . Industrial buildings grouped together can be encouraged to find ways of linking to share locally generated energy usage.

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

A range of technologies should be encouraged, because each has different requirements for optimal performance. One technology not mentioned in the document is onshore wind. Wind energy is now the cheapest renewable technology, and while it has specific site requirements, encouragement should be given for its consideration by developers and landowners.

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?

It would be valuable to indicate what level of production of energy is needed for all Wiltshire's use to be from renewable sources, and set that against current renewable provision (including household solar PV). There are currently grid level constraints on renewable generation and the Council could have a role working with the DNOs to overcome these.

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?

The climate emergency is a threat to our entire livelihoods and society. While conservation of our heritage is very important, just as our most beautiful landscapes have had to accommodate pylons and motorways, so our heritage areas and buildings may have to accommodate change to reduce their carbon footprint. All electric heating systems such as electric radiators or electric boilers have no visual impact, where air-source heat pumps might be inappropriate. Greater tolerance for solar panels on roofs or adjacent open land should be considered favourably for listed buildings or conservation areas where visual intrusion is not severe. However, the high cost and technical challenges of incorporating modifications to listed buildings may mean that in some cases, restrictions on energy use to such buildings may be the only solution.

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?

Air quality improvement will require large scale reduction in traffic not only from cars but from the thousands of daily journeys of delivery vehicles. Our future survival depends on a transformation in our lives, from buying whatever we consider we want and can afford, to buying local and only what is essential. The Local Plan can help by identifying suitable sites for small scale industry from diverse sectors and incentives for businesses to establish in Wiltshire, favouring where possible production of essential items and low carbon production.

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?

The first step is to reallocate budgets for road building to cycling infrastructure, support for local bus and rail services and pedestrian safety. Road repair budgets should prioritise pothole repair, for cycling safety, above repairs that enable faster driving. Control of speed limits to economic levels (around 50mph) on as many roads as possible, with 20mph in most urban areas would encourage modal shift from cars. It is imperative that villages have a bus service with a timetable that serves people's needs. This could be a mini bus. People can be incentivised to use public transport by bus pass schemes.

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?

We are not qualified to suggest measures...

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?

This question is similar to B5. See our answer there.

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

The Plan covers the period up to 2036, a period in which the world needs to take decisive action to reduce carbon emissions if we are to avert the devastating consequences of uncontrollable climate change. While this is a global issue, every part of society

needs to act, and Wiltshire Council has significant powers to influence carbon emissions in Wiltshire. The National Planning Policy Framework requires Local Plans to 'take a proactive approach to mitigating and adapting to climate change in line with the Climate Change Act', which requires the UK to achieve zero carbon by 2050 and (in the 6th Carbon Budget) to reduce emissions by 68% by 2030. The Council voted in 2019 to seek to reduce Wiltshire's carbon emissions to net zero by 2030. There is little evidence in the spatial strategy that this target has seriously been considered.

Rep ID: Climate65	
Consultee code: Other	Consultee Organisation (if applicable): Climate Friendly Bradford-on-Avon Biodiversity group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

BIODIVERSITY NET GAIN and the LOCAL PLAN CONSULTATION

The challenge for Wiltshire Council is to align local plans to the Climate Change Act which specifies net zero carbon by 2050 and a 68% reduction by 2030.

A robust plan can be developed enhancing the blue/green infra structure. By using the SCATTER tool the focus seems to be on urban settings, yet Wiltshire is a beautiful rural county with huge potential for increasing biodiversity, and a risk of real biodiversity loss – depending on choice of housing sites.

All plants sequester carbon so planting trees, hedges, grass leys, permanent pasture and ponds will contribute to the lowering of the carbon footprint. It seems a sensible approach to keep this footprint as low as possible in the first place. Building on brown field sites and protecting green field is one way. Boxes can be included on houses for those species under threat e.g. swift, house martin and bats. All sites should have a Habitat Regulation Assessment (HRA) to determine the cost to the environment. Dorset has one in place for any site over 0.1ha. Other areas of consideration should be the character of the landscape, the status of the agricultural land (1 – 3a is high yielding food production land), orchards, vineyards, geological and soil influences. It takes many years of organic matter to improve the structure of our soils which influences its water holding capacity. Planners should support those people working to improve the land in this way.

High nature value farming can be seen in parts of the Marlborough Downs where farmers have been working together to improve its biodiversity. Wiltshire Council owns numerous farms and is in a position to influence the blue/green infrastructure of these properties. They can be used as flagships to use improvement methods to agriculture as recommended by the National Union of Farmers and others to reduce their carbon footprint and be used to encourage younger people into farming through on site training.

Trees and plant life can help in the uptake of water, as our winters become wetter and help with cooling in hotter summers. (as predicted for Wiltshire by the Met Office). The right trees need to be planted in the right places. Peatlands are better carbon sinks and should not be disturbed. Wetlands help in flood management. Natural England and the Woodland Trust have suggested targets for all areas of England, Wiltshire is in a good position to develop one. Larger trees sequester more carbon than smaller ones, oaks can live for hundreds of years and in Wiltshire are able to grow to their full capacity. Such trees deserve to have TPO's (tree preservation orders) as their carbon footprint is essential to help achieve net zero carbon. The county needs to have a tree planting and protection policy, with rigorous monitoring and enforcement.

Wiltshire is not an isolated piece of land, counties that border it influence our biodiversity. Connectivity is important through hedgerow and waterway management all should be viewed in the local plan for future growth. Soon the new stewardship scheme ELMS will be encouraging such plans.

Flood management is a countywide issue with an increase in wetter winters. Plans to help water retention higher up the river can have beneficial impacts lower down. There are several natural approaches, as Natural England highlight.

Salisbury Plain, used mainly by the Ministry of Defence is a wonderful area of mainly chalk grassland. The MOD have plans to become net zero by 2050 and will be planting woodlands around their bases, developing ponds and have a no mow policy to help to do this. They will also work with their farming tenants to improve soil structure and grazing regimes. [Name Redacted]. Enhancement of the land is good for our health and wellbeing. Please support these ideas.

Rep ID: Climate66	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>We agree that land-use policies need to be evidence based, realistic, viable and achievable but it is too dangerous to assume that the measures in the LP can deliver outcomes that significantly reverse existing carbon emission trends before 2030. Do these measures also take into account the growth in carbon emissions from now until 2030 as the wording is only suggesting 'existing' carbon emissions? It is most likely, particularly following Covid, that funding to ensure the actions required for these policies to succeed will be inadequate and the aims will be delayed or unaffordable.</p> <p>The carbon emission reduction aims must be met. Therefore, the LP needs to be flexible and written with built-in contingency measures which can be speedily put into place should carbon emissions rates not be falling at the rate required to achieve the LP aims.</p>	

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

Introduction of more street friendly towns across Wiltshire to reduce the emissions of slow-moving traffic in areas where the public congregate on foot, particularly Wiltshire's beautiful market towns most of which suffer from congestion and slow-moving traffic. A prime example would be the reinstatement of the Salisbury People Friendly project as soon as possible as agreed in the CAF public consultation.

Convert as many public buildings as possible to solar energy and change all LA vehicles to electrical power.

Provide incentives for all public services (police/fire/ambulance/public buses etc) to convert their buildings to solar energy and vehicles to electric power.

Use firm and clear policy with set boundaries to ensure all planning applications for new developments are 'green'. If this isn't possible immediately, ensure the LP is written with increasing targets towards all construction methods and materials to be green/carbon neutral by a given deadline. All new dwellings to have electric cars points, solar panels, water efficiency measures, good insulation, and working to a tight target date to end the installation of gas boilers. Whilst this would increase the price of a dwelling, the % is likely to be small in comparison with the profit margin of the developer and dwarfed into insignificance in the long-term carbon savings. Sadly, builders will only pay lip service without policy and legislation driving them forward as they are in the business to make money and are in competition with one another.

Provide incentives for community energy schemes

Use shared Best Practice from other Councils and Local Authorities.

A3: How should these actions be delivered and measured?

Delivered by:

Principally by ensuring the new Local Plan is robustly written with clearly defined targets which will drive both public and private companies to meet stretched targets. Backed up by strongly worded policies, again with clearly defined targets.

Provide incentives to meet the targets where practical and possible and financial penalties for non-compliance.

Measured by:

Comparing current air quality at fixed intervals with future air quality

Where possible recording information such as no. of electrically powered vehicles/no.of electric vehicle charging points installed/no. of solar panels installed by public bodies and private developers, no. of houses passed for development with 'green' features and ecological enhancement measures and comparing current and future figures.

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

Not a question that can be answered by a lay person without all the facts, knowledge and experience required to answer this question.

As above our prediction would be that funding will have a huge impact on the success or otherwise of the measures and therefore the LP must not be set in stone until 2036 but be flexible enough to react to whatever the future holds.

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?

No. The statement 'All new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy' is an appalling starting point for a document which will remain current to 2036. Swindon Council (part of the county of Wiltshire) Policy DM 32 Biodiversity, amongst other good points, states at para 4 'All developments must secure a minimum of 20% measurable net gains for biodiversity or as set out in legislation, whichever is the greater.' The LPs of many LAs either already state 20% or are increasing to 20% net gain in biodiversity when being reviewed and it will be hugely damaging to Wiltshire's wildlife to fall behind the accepted way forward. It is good to have a figure, but it needs to be at least 20% in line with Swindon and other LAs if it has any chance of still being relevant in 2036. There is no logical reason why Wiltshire's safeguards for biodiversity should be any less than Swindon's. In Wiltshire Council's own response to the government White Paper the Council highlighted its concerns that 'streamlining the local plan process must not be at the expense of adverse impacts on the environment'. The White Paper makes huge assumptions about the depth of ecological knowledge which is held by various organisations across both the county and the

country. Organisations with experience of the natural environment and ecology such as CPRE, Wildlife Trusts and RSPB are extremely concerned that the White Paper proposals are much in the favour of developments and will provide little or no protection to our countryside and wildlife.

Therefore it is imperative that this draft of the Local Plan and/or supporting documentation contains the detail and means to ensure that the environment and wildlife of the county are protected.

There is no mention in the measures listed in Policy Theme 2 of the ecological importance of the built environment and the opportunity it presents to provide a net gain in biodiversity. Given the amount of development that is forecast to be undertaken this is a huge omission. The potential of the built environment to contribute to reduced carbon emissions, nature and wildlife and the health and wellbeing of the population must be recognised and addressed. Ecological enhancement measures can be conditioned in individual planning applications, but a much more consistent and reliable approach is for LA planning strategy/policy/guidance etc documents to spell out what ecological enhancements are required to ensure the built environment can sustain as much wildlife as possible. It makes practical sense to include low-cost ecological enhancement measures in all new development to provide at least a 20% gain in net biodiversity to compensate for the loss of both our brownfield and greenfield sites. Much is easily achievable by including such measures as bird, bat and bee bricks, hedgehog highways, ponds, hibernaculas, wildflowers, hedgerows, tree planting, green roofs, allotments and orchards etc etc, all of which also contribute to reduced carbon emissions.

This draft Local Plan should address and incorporate the proposed changes to the NPPF and the National Model Design Code which are currently under review, otherwise the LP will be lagging behind the standards expected before it is published. The draft NPPF states 'all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design'. The NPPF proposed wording P178 Habitats and Biodiversity....'plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

The current Wiltshire BAP 2008 p130 recognises that the provision of bird and bat boxes provides an opportunity to enhance wildlife in the built environment and lists swifts as a 'priority species'. We understand that the BAPs are to be replaced by the government's 25 year Environment Plan which has yet to reach LAs. In the interim the detail contained in the local BAP is not being updated and we are concerned that it is not being referred to. If this is the case, then either the new LP must contain such detail or there must be Supplementary Planning Guides for building design and biodiversity written for implementation at the same time as the LP. See examples of wording of other LAs for both LPs and BAPs:

London Borough of Islington draft LP 2020-2035 G4 section 5.27 Pg 153 states: "Islington's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow, peregrine falcon and black redstart, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many of species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan, and in many cases, will include micro habitat creation. Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats."

Shropshire Council Regulation 18: Pre-Submission Draft Local Plan 2016 to 2038 August 2020:

Pg 91 7. Maximising opportunities to increase the quantity, quality and connectivity of natural assets in accordance with policies DP15, DP16, DP17 and DP23 through habitat creation and management measures, provision of appropriately designed and suitably located bat and bird boxes or swift bricks and any other such measures which would support protected or priority species.

Cornwall Planning for Biodiversity Guide: Pg 11 - 5.1.5 Enhancement In order to deliver ecological enhancement across Cornwall all new residential developments are expected to provide either a bat or bird box/tube within the structure of the building at a rate of one box/ tube per unit. Consultant ecologists will be able to provide advice on how to group these within developments as it is likely that bat and bird boxes will be grouped on units closest to suitable habitat. For developments of two or more houses every other building needs to have a bee brick built in as well as the bat and bird boxes. At least 75% of bat and bird boxes must be provided built into the dwellings themselves as tree mounted boxes have a limited life span.

Wiltshire's Planning & Building Control guidance does recognise the 'potential damage of new developments' and gives examples of habitat enhancement and recognises that 'natural nest sites are quickly disappearing in most urban areas, contributing to a decline in bird and bat populations. Artificial nest boxes provide nesting and roosting sites for a wide range of birds and bats, including species under threat such as: house martins, swifts, swallows, house sparrows, peregrine falcons and bats'. It also gives examples of habitat enhancement 'Incorporating nest boxes into the fabric of a building ensures the longevity and safety of the box and minimises maintenance needs and visual impact'.

The British Standard Institute will be publishing a new standard 'BS 42021 Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes' late spring/early summer 2021 and this should be incorporated in the LP. This

standard advocates the use of a 'universal' brick, which in essence is a swift brick but with an entrance hole of at least 30mm to allow for the red-listed starling. Studies at The Duchy of Cornwall sites are showing that swift/universal bricks are being used by the red-listed house sparrow and starling, and the amber listed swift, expected to be red listed at the next review. All three species are undergoing major decline caused by the loss of nesting sites on existing buildings due to re-roofing and replacement of soffits and fascias. Swifts, for example, have experienced a catastrophic decline of nearly 60% in the last 20 years. There is also photographic evidence of blue tits, great tits, nuthatches and even house martins using these bricks to nest making them a very cost-effective ecological enhancement measure for developers as one brick type will provide a nesting provision for variety of bird species. Bricks are easy to include in routine building practices resulting in an inexpensive biodiversity enhancer with the nest site confined within the brick with no access to the roof space. Integrated bricks are aesthetically pleasing, maintenance free, long lasting and less prone to predation and temperature variations.

The proposed Local Plan has not embraced central government's expectations:

National Planning Policy Framework (NPPF, 2019) Section 170(d) states "Planning policies and decisions should contribute to and enhance the natural and local environment by: ...minimising impacts on and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures..."

Section 174(b) states: "To protect and enhance biodiversity and geodiversity, plans should ...promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

NPPF, Natural Environment Guidance, paragraph 023, Reference ID: 8-023-20190721 How can biodiversity net gain be achieved? Provides further guidance stating "...relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat."

Government press release (21/07/19) James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication stated: "For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people." Thus, the Government's support for such measures was stated explicitly. Natural Environment and Rural Communities (NERC) Act 2006 Section 40 states: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

"Living With Beauty" (30/01/20) the Government's Building Better Building Beautiful Commission report recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110).

Examples of the level of nest box provision in new developments:

At least a 1:1 ratio of nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). The RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick.

A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity and The Royal Institute of British Architects (RIBA) in 2013.

The Duchy of Cornwall adopted the same principles in 2015, and a good example of the provision of a general type of integral box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay.

The Cornwall Council Biodiversity Guide (2018) gives prescriptive measures for the provision of bat and bird boxes, again at the rate of 1 nest place per new dwelling. This document also includes a case study on Nansledan mentioned above.

The Oxford City Council Technical Advice Note on Biodiversity gives an 'expected provision' of bird nest sites for building dependent birds (i.e. swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest boxes in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m² floor space. Brighton & Hove City Council condition a minimum of 3 swift nest bricks or 2 per dwelling in all new developments that are five metres high or above and commercial developments will be required to have a minimum of 3 boxes, or one per 50m² of floor spaces.

Whilst we recognise that much of the above is too detailed to be included in the Local Plan, it provides the justification for a robust top-level statement to be included regarding the provision of ecological enhancements quoting examples and a net gain in biodiversity of at least 20%. If the LP cannot contain detail it must be supported by SPDs/BAP etc equivalents.

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?

Again there is a huge opportunity being missed. The LP must be robust enough (with detail if necessary in Supplementary Planning Documents) to ensure that developers include ecological enhancements sufficient to provide a 20% net gain in

biodiversity. The built environment is ever growing and therefore it is increasingly important to encourage wildlife to thrive within it as it can also be a 'green and living' environment. The LP needs to include the wording necessary to ensure that not only ecological mitigation is undertaken for all development, but that ecological enhancement measures are also included. A net gain in biodiversity of at least 20% will go some way to redressing the balance of huge developments already built which have provided little or no gain in biodiversity. Adding small enhancements such as bird, bat and bee bricks, hedgehog highways, living walls and roofs, wildflower mixes and ponds to newly created built environments contributes to mitigating some of the negative effects of climate change as well as to contributing to health and wellbeing.

The British Standard Institute has new standard 'BS 42021 Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes' is due to be published late spring/early summer and therefore should be incorporated in the LP.

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?

As a layperson this is not a question we have enough knowledge and expertise to be able to answer other than a 'guess'. We strongly suspect lack of funding and willingness of those required to co-operate to achieve this aim will be major factors in this not being achievable. Much will depend upon the determination of Wiltshire Council to make it happen. Very few people/organisations etc take steps which are costly or inconvenient to them without either financial incentive (which is probably not possible with funding in short supply) or being forced by legislation. Perhaps in a similar way to how 'peer' pressure is a persuasive tool, the Council should use all the media (including social media) avenues to create a 'social' peer pressure campaign to make all individuals and organisations feel they should make more of a contribution to achieving this goal.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not sure what this question is asking. If it is asking will developers say a zero carbon development is not viable, it will probably involve all parties absorbing some extra cost, but if the Council is serious about its Climate Emergency declaration then there is no choice

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council must aim to implement net zero carbon both in construction methods and materials used for new developments by 2036. This should be done by setting incremental efficiency targets from 2023-2036. This will allow developers time to forward plan and implement the changes necessary to meet the targets. It will also allow them some flexibility in the order in which they introduce carbon efficiencies eg to meet the first period target they may introduce solar panels to all buildings in preference to electric vehicle points if the electricity grid is not yet capable of supporting more demand in electricity. Whichever building standards are used they must cover the whole remit of carbon efficiencies that are possible, be robust with clear targets and they must be imposed by the Local Authority. They should make clear that heavy penalties will be applied for non-compliance. Penalties need to be set high enough so that it is cheaper for developers to comply rather than pay the penalty. Fines must be followed through by the Local Authority to make clear to developers that non-compliance will not be tolerated. See proposed wording in the draft text of NPPF consultation document currently out for review: 'Enforcement 58/59. Effective enforcement is important to maintain public confidence in the planning system. They should consider publishing a local enforcement plan to manage enforcement proactively... This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate'.

Some of the ideas in the Government White Paper such as house and street design would hopefully make the 'boxy' boring housing estates of the large developers a thing of the past. However, it is a very dangerous document as far as protecting the green and brownfield spaces for nature and wildlife. It makes a massive assumption that there are comprehensive data already held on most parts of the country, which is just not true. There are random voluntary organisations holding various sets of data often submitted by volunteers with an interest in one particular species. The White Paper does not allow either the time or the resource to try and produce a comprehensive ecological map for each area. It will produce a 'static' set of rules over a set time period for a constantly changing environment, not allowing for the natural changes that will occur over the life of any Local Plan. See response from yourselves to the White Paper:

"However, the need for robust environmental assessment cannot be avoided. Poor quality assessments will produce ill-conceived plans. There is no detail in the White Paper as to how the simplified process will continue to evaluate the likely significant effect of the plan on the environment and determine how adverse effects may be mitigated or where beneficial effects may be enhanced. Given the proposals in the White Paper to grant automatic outline planning permission in some cases, the strategic assessment of a Local Plan will be even more fundamental with the potential for less robust assessment at the development stage. Streamlining the local plan process must not be at the expense of adverse impacts on the environment."

Hence it is more important than ever that this version of the Local Plan does contain the detail and measures to ensure the protection of the Wiltshire environment and wildlife.

All new development should provide at least a 20% gain in net biodiversity much of which is achievable through small low-cost enhancements such as bird, bat and bee bricks, hedgehog highways, ponds, hibernaculas, wild flowers, hedgerows, tree planting, green roofs, allotments etc etc, all of which also contribute to reduced carbon emissions.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Grants/loans incentives where possible but more realistically changes in planning policy to ensure any future work to an existing building must achieve additional reductions in carbon emissions and include whatever ecological enhancements that are practical to install.

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?

We do not have enough knowledge or expertise to judge where the measures outlined go far enough. Hence the reason why the LP must be flexible enough to provide for tougher policies to be introduced during its lifetime if targets are falling behind schedule.

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

The Council should encourage all technologies to provide green energy as long as they are 'green' in themselves. If any technology has the potential to damage the environment this should be made clear and the implications fully understood before considering implementation.

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?

Yes the Local Plan should set targets. The targets should be increasing incremental 'stretching' steps from 2023 to 2036, this would allow for the forward planning required to meet the targets. The targets should be in line with the UK commitment to renewable energy targets, which hopefully are in line with global targets. We do not know how they might be measured as we have no idea of what mechanisms the Council has at its disposal for collecting information.

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?

We haven't the technical knowledge and expertise to answer this question. We would think there will be Listed Buildings and Conservation Areas which will struggle, but whatever steps are possible should be considered and, if practical, taken. It might not be possible to achieve the same ultra-low/zero carbon forms of energy production in the short term, but as technology is driven in this direction hopefully this will be increasingly possible in the future.

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?

If Wiltshire does not already have the data/knowledge and expertise to answer this question, then how on earth do you suppose it can be answered by the majority of the general public! Measure the air quality, refer to the studies on how to improve air quality and take action! Legal targets for air quality have been set for many years and at present there are no consequences for failing to meet them, even though the Government is responsible in law.

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?

Policies to ensure more electrical vehicles are provided by bus companies, a mix of vehicle sizes with smaller, more frequent hoppers on inter town routes.

Charging points in all car parks, out of town shopping car parks, LA housing stock, LA vehicles

Max fee of £1 for park and ride

Make town centres 'People Friendly Streets' by stopping cars effectively using town centres as 'rat runs' (just travelling through), force them to use alternative routes unless stopping to make use of the facilities, or reside in the town.

Charging points mandated per dwelling for all new developments.

People do not like change, and many will only react to measures which cost them money. So all initiatives need to be attractive eg save users money, be more convenient etc. Hopefully one day being 'green' will suffice but until it does then people need to be led and encouraged and if necessary 'shamed' as did public information advertisements for drink driving.

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?

Strange question – discussions with Distribution Network Operators/Distribution Service Operators are the obvious way forward to establish the possible 'shortfall' in power. Then agreed measures to manage the shortfall. Allow developments the flexibility of using an alternative carbon efficiency measure in the short term.

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?

There needs to be an acceptance that there will initially be extra costs involved to ensure climate targets and zero emissions are achieved, and these costs will need to be shared across the board. We all have to be responsible for changing our habits and contributing to the cost in order to make this viable. Look to best practice in other countries/counties for zero carbon designs. If done well the resulting design should provide a healthy and attractive environment for everyone to enjoy with wildlife thriving on the doorstep, allotments for food and exercise, green spaces for relaxation and exercise, play and educational activities for children, resulting in the building of communities. Hopefully new design can only improve on the current stagnant and predictable 'pattern books' that large developers use.

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

This document is headed 'Addressing Climate Change and Biodiversity Net Gain through the Local Plan'. Having read the document and then scanned through again there is little mention of biodiversity. The document is almost wholly about Climate Change with the odd mention of biodiversity thrown in.

There are no obvious questions on biodiversity and so we were forced to seek guidance as to where to input our comments on biodiversity issues. Even then there is only one question in the whole document that seeks input on biodiversity (Qu B2) and this was for some time published incorrectly in the consultation document (it was published as a repeat of B1). So, unless members of the public are persistent (and also read the actual questionnaires) they would not necessarily know there is an opportunity to comment on biodiversity.

If you are aiming to collect the views of the public on biodiversity for the county going forward this consultation paper is very poorly drafted and does not encourage the public to comment. The majority of the public do not have the knowledge/data/expertise to answer many of the questions, hence answers will often be guesses and will not generate a meaningful response. The overall language used in the document is also not aimed at the public whereas the 'Planning for (various towns/villages) consultations' were written in a 'friendly' language and style much more likely to engage the public.

Rep ID: Climate67	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
 - Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
 - Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
 - Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
 - Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
 - Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
 - Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
 - Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
 - Introducing planning policies that require climate change impact assessment
- Introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth;
- follow the recommendations on planning made by the Climate Emergency Task Group;

Rep ID: Climate68

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.
- Introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth;
- Follow the recommendations on planning made by the Climate Emergency Task Group;

Rep ID: Climate69	
Consultee code: General Public	Consultee Organisation (if applicable): Tisbury and West Tisbury Neighbourhood Plan Steering Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate69
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?	
It may well be that Land-use policies of themselves will not be sufficient to make a significant difference to carbon emission trends before 2030, but that is not a reason not to do anything. The Council has to recognise its responsibility to set an example with its own policies and procedures; and to ensure that Land-use policies are so phrased in order to at least make a contribution towards Climate objectives.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

At the very least, ensure that all policies and procedures are all in alignment and that every employee in every department understands the contribution they can make. The Council needs to ensure that it underpins a positive climate-friendly culture throughout the whole organisation, otherwise there will be a perception of “do as we say but not as we do” which would not be healthy.

A3: How should these actions be delivered and measured?

It is for the directors of every department to ensure that Climate-friendly policies and procedures are defined and implemented throughout the organisation. Every member of the Council should be able to contribute to a culture of reduce, re-use and recycle.

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

No – the proposed Policy Theme 1 is full of “get-out clauses”, essentially enabling developers to do exactly as they please. The measures do not go nearly far enough. The words “should” and “could” must be replaced by “must” and “will”. Remove all references to “where technically feasible”. If a developer argues that a particular development will not be technically feasible, then planning permission should not be granted and should be refused. Developers need to understand that they cannot continue to hold communities to ransom.

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?

Again – Policy Theme 2 is weakened by the use of the word “should”. Replace “should” with “must” and then the policy might have a better chance of success.

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?

Again – Policy Theme 3 is weakened by the use of the word “should” and “could.” Replace “should and could” with “must and will” and then the policy might have a better chance of success. Developers will always argue the case for the cheaper option. Unless higher standards are demanded of them, they will continue to ignore UKGBC objectives and targets.

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?

The Council has an opportunity to set high standards. If it doesn't water down its policies with pathetic words like “should” then net zero targets ought to be achievable. Possibly a phasing-in policy during the first few years of the Local Plan might be helpful if agreed through S106-style agreements.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Developers may well argue that net zero targets will affect scheme viability. Tough on the developers. They have to recognise that they must take responsibility for their actions and they can't carry on destroying the planet.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

There is no excuse for not implementing the highest possible standards of building control.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Retrofitting and modernising of the existing housing stock is already supported by Government grants. The Council could help to promote greater uptake by ensuring wide publicity eg promotional and information leaflets sent with every Council Tax demand letter. Educate householders with worked examples of typical costs and benefits of retrofitting.

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?

The policy needs to be strengthened by greater insistence that measures will be implemented. Delete “should” and replace with “must”.

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

There is no harm in encouraging all appropriate “green” technologies but the Council must beware of “false” green initiatives, such as supporting the implementation of biomass wood-pellet burners which use imported wood pellets transported from half-way across the world.

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?

At the very least, the Council should set minimum targets.

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?

At a purely pragmatic level, there will have to be a recognition that retrofitting may not always be appropriate for some truly historic properties. Wiltshire has many listed buildings and other iconic non-listed properties. Rather than insisting on the retrofitting of sixteenth-century cottages, it is surely more important to concentrate on the implementation of high standards for all new development.

If applications come forward for extensions and alterations to historic properties, then a conversation about carbon-friendly initiatives can be held at that time.

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?

Yes – the aspirations are good but the policy does not go far enough. Wiltshire Council has to recognise that it has to support improved provision of both quality Broadband infrastructure and the public transport network, if it really wants to achieve a reduction in the use of the private car.

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?

1. Insist on electric charging points in all new developments
2. Implement a policy of a minimum of 2 independently accessible parking places per new dwelling, in recognition that nearly every household does have more than one car and it is necessary to get those cars off the roads – then it will be feasible to –

3. Install traffic calming measures in all new developments to make driving uncomfortable; widen the pavements and make space for safer cycling.

4. Make more and better provision for cycle storage in Council owned public spaces; car parks etc. Liaise with the rail authorities to encourage better provision for bicycle storage. Liaise with the bus companies to ensure joined-up timetables for the buses and trains.

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?

Make land available for Distribution network and service operators to install electric charging points. Streamline the administrative process.

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?

This question is not written in English.
However, if developers try to argue that scheme viability is threatened by requirements to build to zero-carbon standards, then refuse to grant planning permission. They will soon find ways of achieving the required standards.

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

Rep ID: Climate70	
Consultee code: Statutory Body	Consultee Organisation (if applicable): The Canal & River Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: n/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
The Local Plan should recognise alternative low and zero carbon energy sources and futureproof the plan by being sufficiently flexible to allow other types of technology to be included as they become available. The Canal & River Trust promote the use of canal water as a low/zero carbon energy source. Early discussions should be encouraged for any major development and the allocations alongside the canal.	

A3: How should these actions be delivered and measured?

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

The Local Plan should recognise alternative low and zero carbon energy sources and futureproof the plan by being sufficiently flexible to allow other types of technology to be included as they become available. The Canal & River Trust promote the use of canal water as a low/zero carbon energy source. Early discussions should be encouraged for any major development and the allocations alongside the canal.

It is possible for Surface water drainage to be discharged to the Kennet & Avon Canal, subject to its location, quality and quantity of the water and a suitable commercial agreement. Developers are urged to commence early discussions with the Trusts' Utilities team. Flooding from the canal should be recognised in FRA's.

The provision of charging points/moorings for electric boats should be considered in new waterside developments and in areas such as Devizes Wharf to allow boaters to move to a more sustainable energy source. This matter will require further discussion with the Canal & River Trust.

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?

The Canal & River Trust fully support this policy and welcome the recognition of the importance of blue infrastructure. The Kennet & Avon canal is a perfect example of multifunctional green/blue infrastructure, and the Wilts & Berks canal can provide similar opportunities in advance of it becoming navigable. We suggest active travel should be added to the list of possible benefits. We suggest that the Kennet & Avon canal could be used as a location for off-site net gain, with the agreement of the Canal & River Trust and sections of the Wilts & Berks canal could be delivered where a development needs off-site compensatory greenspace or habitat.

We welcome recognition that the existing GI policy needs updating to ensure that significant enhancement of existing assets by proactively planning for the incorporation of GBI in new developments, or through waterway improvements is explored to its full potential.

The Trust would welcome early engagement in the GBI strategy and thank the council for the support already given in delivering improvements to the canal towpath around Devizes which has improved access to and along the canal towards the countryside for residents. We note that several of the proposed allocations will also provide opportunities to improve the canal and towpath as GBI. The GBI and canal policies are intertwined and the canal policy is also in need of updating to ensure that the full range of issues are properly covered and supports the main GBI policy.

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?

The Canal & River Trust promote the use of canal water as a low/zero carbon energy source. Early discussions should be encouraged for any major development and the allocations alongside the canal.

The provision of charging points/moorings for electric boats should be considered in new waterside developments and in areas such as Devizes Wharf to allow boaters to move to a more sustainable energy source. this matter will require further discussion with the Canal & River Trust.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

The Canal & River Trust promote the use of canal water as a low/zero carbon energy source. Early discussions should be encouraged for any major development and the allocations alongside the canal.

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

No, the plan needs to be flexible to allow the use of all technologies as they become available or most cost effective in a rapidly changing world. The Canal & River Trust promote the use of canal water as a low/zero carbon energy source. Early discussions should be encouraged for any major development and the allocations alongside the canal.

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?

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?

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?

The provision of charging points/moorings for electric boats should be considered in new waterside developments and in areas such as Devizes Wharf to allow boaters to move from diesel generators to a more sustainable energy source. This matter will require further discussion with the Canal & River Trust.

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?

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?

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?

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

Rep ID: Climate71	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>I would add that they also need to be ambitious in order to realistically respond to the gravity of the climate breakdown that the earth beginning to experience.</p> <p>I do believe that it is reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030 IF it is sufficiently ambitious, and it is vital that it avoids the temptation to simply outsource carbon emissions to other areas/countries.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Transport appears to be the biggest area to tackle. To do this the Local Plan needs to greatly increase and probably further subsidise public transport in order to provide cheap and easily accessible alternatives to using cars. Relying simply on individuals to switch to electric vehicles is not nearly good enough. 'The Market' has so far shown itself to be an entirely inappropriate tool to tackle climate change, and the council and other bodies need to take more direct action in order to steer people away from damaging activities such as driving cars.

Cycling needs to be encouraged through a large expansion of safe and well maintained cycle routes. Private vehicle use needs to be actively discouraged. Schemes such as Salisbury's People Friendly Streets are evidently opposed by many in our town, but the reality is that we can't simply encourage alternative transport, whilst not making driving cars less appealing. The road system in this country has been sadly built around private vehicles over the past half century especially, and it is simply not sustainable to increase road capacity - in fact it needs to be reduced in order to make better use of transport routes where they are given over much more to cycling, walking, and public transport.

A3: How should these actions be delivered and measured?

Consultations (ideally a bit simpler and easier to access than this one) are important in delivery, though implementation should be measured against the councils declaration of a Climate Emergency first and foremost, whilst doing as much as possible to take people with you.

They should be measured in a reduction of car usage, and sales, an increase in public transport usage and also in additional routes/more reliable services where appropriate. Bike paths etc. should not be measured primarily in distances (i.e. how many miles of paths have been created) as then you are liable to end up with slightly ridiculous cycle paths like the ones on the road through Laverstock, but more in how well connected areas are by bike. Perhaps some sort of grading system could be utilised to give people an idea of how traffic free/well maintained etc. a particular stretch of bike path is. Then the aim would be to get as many areas connected with the best quality bike paths possible. Maps could then be kept updated for the public to see how the bike paths were progressing. Groups such as COGS in Salisbury could be a useful partner in doing something like this.

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

I am by no means an expert on flooding, but these measures sound fairly reasonable to me.

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?

I would question the idea of 10% net biodiversity gain being off-site - I think as much as possible any new developments should be made in a way where they themselves are as biodiverse as possible.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

To an extent, yes, though electric/hydrogen vehicles still produce air pollution from their tyres, so I would again say that the push towards public and active modes of transport need to be pushed more than installing more charging points for electric vehicles.

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?

Low traffic zones, covered on-street bike parking rather than residential areas being given over to car parking spaces with the occasional exposed bike rack.

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?

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?

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



Rep ID: Climate72

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I wish to support other contributors who hope we shall see Wiltshire Council taking the following into consideration:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

To work towards all these important things, please:

- introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth;
- follow the recommendations on planning made by the Climate Emergency Task Group;
- completely rewrite the current Local Plan proposals in line with the above.

Rep ID: Climate73	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
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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?

Just an observation: I couldn't see in the consultation document any reference to the fact that many houses in rural areas of the county rely on domestic oil (or bottled gas) for heating. This might be worth flagging as the policies are developed further since such properties might be well worth targeting in any retro-fitting scheme for cleaner energy alternatives and such schemes might be appealing to the householders. This observation relates also to question B11

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

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?

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?

see response to consultation question B8 above

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?

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?

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?

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?

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

Looking at this consultation document together with the others on which Wiltshire Council is currently consulting on, I am unclear as to when, and in what form, there will be a chance to feed in views on future transport options in the county. There is reference here and there to an emerging transport plan and to policies in the Local Plan, but it's not clear from the Council's website what the timescale for, or approach to, reviewing the issue of transport in the county is. It may be there, but I've had a couple of attempts at finding it, and have failed

Rep ID: Climate74

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Corsham Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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

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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?

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

1. Corsham Town Council believes that Wiltshire Council must raise its ambitions with regards to tackling climate change. It should adopt, in full, the recommendations relating to local plan policies in the report of the Wiltshire Council Global Warming and Climate Emergency Scrutiny Task Group that was considered at the Council's Environment Select Committee on 3 January 2021. Corsham Town Council specifically supports:

- a. the prioritisation of climate change mitigation through spatial planning, including measures to optimise sustainable and active travel;
- b. the delivery of sustainable design and construction methods;
- c. the identification of suitable areas for different types of renewable energy generation, including a call for sites, and the encouragement of proposals and applications for renewable energy developments;
- d. measures to reverse the ecological crisis in order to achieve biodiversity net gain, with green and blue infrastructure at the heart of new developments, and to tackle flood risks and promote sustainable water management.

2. Corsham Town Council asks Wiltshire Council to pursue every possible avenue to ensure that homes granted permission from today or as soon as possible thereafter are built to carbon neutral standards such that they will not require retrofitting to meet Wiltshire Council's own 2030 target for carbon neutrality.

Rep ID: Climate75

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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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?

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?

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?

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

I am writing in full support of the recommendations made by the Council's Environment Select Committee (13 Jan 2021) and to ask that these recommendations are implemented as a matter of urgency in future planning for the county. It is vital that we meet our target of carbon neutrality by 2030.

I am particularly concerned about transport with regard to a) the future availability of street electric charging points and b) a major rethink on public transport in the county.

It is essential that we have ultra-low-emission vehicles that run with realistic timetables that are of practical use to bus users. Currently, the buses that serve rural communities are chronically under-used because the bus times are so infrequent that they are impractical for users. For instance, if a resident of a village wishes to spend, say, just two hours in Salisbury shopping (not an unreasonable plan) this is impossible on many services – a shopper can either spend one hour, or more than three. There must be better flexibility than this or people will continue to use their own transport. Equally, for people in rural communities, anyone wishing to spend an evening in a restaurant or at the theatre in their local town is obliged to use their own private transport. In the case of my own village the last bus out of Salisbury arrives in the village at 6.15pm! There is a vicious circle that unhelpful timetables result in fewer bus users which result in even more cuts and more unhelpful timetables.

As far as electric cars are concerned, the Council needs urgently to consider not only off-road charging but on-road charging points. It is well reported that petrol and diesel cars are to be phased out and I believe there is the will in the public mind to switch to electric. However, many residents in both urban and rural areas have houses with no off-road parking and people who might otherwise wish to purchase an electric car will be deterred from doing so until they see that charging is feasible and simple.

My other major concern is about tree cover in the County. I see it as essential that every new housing or commercial development must have sufficient native tree planting.

Equally important is a re-think in farming whereby the Council actively encourages farmers to farm in new ways that support trees, and thus wildlife. Currently, every single winter we all see the depressing sight of hedgerows being decimated by farming machinery – as far as one can tell as a mere matter of timetable and tradition - whether or not it is necessary or of any immediate benefit to the farmland adjacent to them. It is vital that some hedgerows should be left so that winter birds have roosting places available and overwintering insects can be protected. The Woodland Trust offers information on this:

<https://www.woodlandtrust.org.uk/plant-trees/agroforestry-benefits/>

The rate at which nature is being depleted in the UK is a risk to all of us and the current crash in biodiversity is as much an emergency as the climate crisis.

Finally, I support the recommendation that farmers should be encouraged to diversify and install solar arrays and wind turbines on their land, in addition to solar farms being built on existing available Council land.

As I understand it, the existing planning for the county cannot possibly meet the climate targets that are required. If we have any hope of improving this, then radical action must be taken. Points 97 and 98 of the Select Committee's report refer, which I have copied out in full below (my italics)

97. Presently there is a misalignment between Wiltshire Council's commitment to addressing the climate emergency, and its existing strategy and policies. This was underlined by comments made by the Centre for Sustainable Energy (CSE) at a meeting with the Task Group and Wiltshire Council strategic planners. Wiltshire's current Local Plan suffered from vague language and did not make climate change mitigation measurable (essential if carbon reduction policies are to succeed). The same point was made in a letter to Wiltshire Council from Client Earth, an environmental charity that has won high profile cases against the Government on air pollution and put 100 local authorities across England (including Wiltshire) on notice of legal challenge if they do not introduce proper climate change plans.

98. Wiltshire Council's current Local Plan, adopted in 2015, is about to undergo revision. This is a formal process which will need to be supported by a robust evidence base to inform the new and revised policies. Wiltshire Council's carbon reduction ambitions, which include seeking to make the county carbon neutral by 2030, will therefore need to be at the heart of the Local Plan Review (LPR) review, at both strategic planning and planning policy level.

To use a well-worn cliché, this is not a drill – we cannot tinker around the edges of this emergency pretending that a few token gestures are good enough. For the sake of all future generations, we need to ensure we meet our carbon targets. There will be no second chances.

Rep ID: Climate76

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

No it isn't even possible with your proposed plan. I support the CAUSE response to this consultation in its entirety.

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

Stop encouraging car use by building massive estates for city workers to live in that require car journeys to other towns/cities or to the station and back; you are also encouraging parents to drive children to school because of the distances involved. Smaller is better.

A3: How should these actions be delivered and measured?

I fully support the CAUSE submission to this consultation.

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

SUDS are proven in many cases to be ineffective. Building huge estates just adds to the flooding problem. We need more trees, and County Farms managed properly, not sold off for short-term profit.

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?

No. You cannot enhance your green/blue infrastructure by concreting it over!

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?

No, and Wiltshire Council know it! Councillors [NAME REDACTED] have said as much in Cabinet and Full Council - "We all know the target isn't really achievable, it's just something to aim at"!

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?

It is possible to have a net zero carbon development policy that would ensure net zero operational emissions for all the allocated sites in the Local Plan, as is already the case for some adopted Local Plans and other LPAs are doing in their emerging plans. This should be backed up by strong sustainable (low carbon) construction and renewable energy generation policies. These policies will not, however, prevent the destruction of carbon sinks or require the lost sequestration is compensated. Neither will they prevent the transport emissions that results from poor spatial planning and place shaping, the negative effects of which could wipe out the positive effects of such policies.

With regards achieving net zero carbon new development; by undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible, given that Core Policy 41 has been abandoned and the badly insulated houses being given permission at present will all need to be retrofitted in future.

The spatial strategy itself needs to be net carbon neutral, focused on providing housing where there is employment (to be 'employment led'), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging infrastructure (and locations that require this) and removing rather than increasing dependency on private cars to get around.

The current proposals would unnecessarily destroy natural capital/carbon sinks and increase transport emissions through commuting, whilst bearing no relation to local employment or local housing need, which would be better achieved through urban regeneration/brownfield sites. The latter would provide affordable housing (e.g., apartments), reduce the need for cars and help rejuvenate the town centres of principle settlements and large market towns that are in danger of being doughnuted (i.e., having suburbs supported by in-migration and out-commuting, that are disconnected from town centres, with separate shops and services, leading to further deterioration of town centres, vacant shops, and unused town centre facilities).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. There is considerable evidence for the viability net zero carbon development polices in Local Plans (please refer to the Centre for Sustainable Energy for examples and background papers). The need for net zero carbon development is set to increase in future, as the Government requires planning

decisions to prioritise climate change considerations. Viability will become a secondary issue as policy and legislative requirements ramp up. Once net zero carbon development policies become more mainstream, additional cost will no longer be material. Wiltshire Council needs to worry less about viability, accept the inevitable changes that are coming and focus on:

- developing a carbon neutral spatial strategy;
- putting a robust net zero carbon development policy in place;
- actively promoting renewable energy development, including on its own farms (and using these for food production/tree planting and renewable energy generation rather than selling for short term financial gain);
- putting policies in place to promote the transition to ultra-low emission vehicles (waking up to the fact that electric vehicles as will be the norm by the end of the Plan period).

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which several leading local authorities are already doing through their local plan policies. In addition to decarbonising its spatial strategy, the Council needs to put in place a policy that requires all development be net zero-carbon, in line with the UK Green Building Council's Net Zero Carbon Buildings Framework Definition. The Building Research Establishment's BREEAM offers a range of sustainability assessment methods and standards for master planning projects, infrastructure and buildings from new construction to in-use and refurbishment, which can be used in guidance to supplement an overarching net zero development policy in relation to individual (particularly commercial) buildings.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This could be done via a policy to support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g., solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements, although this would make a small difference in terms of overall impact. It is unclear what the Local

Plan could do, if anything, to promote the retrofit of existing buildings, which needs to be a priority for Wiltshire Council to address, and would make a substantial difference in terms of reducing carbon emissions.

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?

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. This would allow for future innovation and adaptable approaches, which could help a faster transition to net zero. Working with communities, including for example community energy organisations, will be an important aspect, helping to ensure renewable energy generation is suitably located and recycling benefits directly back into the local economy/community.

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?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system supports the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.”

The Local Plan should therefore set a net zero target based on an assessment of its carbon reduction potential and develop policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside a genuinely sustainable Spatial Strategy and carbon neutral development policies. Separate interim targets could be set for the generation of renewable energy during the Plan period, consistent with the overall net zero target.

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?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy generation. This includes in conservation areas and listed buildings, providing they are sympathetic to their setting and significance but enhancements could be made to the latter.

The main imperative for Wiltshire Council is to promote retrofit of existing buildings throughout the county, which is beyond the scope of the Local Plan to influence as far as I am aware. The Local Plan priority should be on sustainable housing numbers in sustainable locations that don't destroy carbon sinks and promote commuting, backed up with net zero carbon development, sustainable construction and renewable energy policies, including LDOs for suitable Wiltshire Council farms, such as the ones in Chippenham.

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?

A more organic growth/local employment-led development approach, with supporting policies, would prevent large scale commuting and associated air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work, thus reducing air pollution associated with a daily commute. This is particularly acute in towns like Chippenham and Melksham where thousands of vehicles drive through all parts of the town to the A350 and up to the M4 and onwards to their places of employment, contributing substantially to air pollution at peak periods, which also coincide with children walking to school and breathing in the NO_x gases and particulates.

The currently proposed excessive housing numbers and spatial strategy would simply add to this air pollution and damage to young people's health, as well as creating even more air pollution in town centres, as a result of all the additional vehicles associated with the urban extensions.

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?

An employment led spatial strategy would significantly reduce the amount of commuting and dependency on private cars. Policies that promote (preferably ultra-low carbon) public transport and active/battery enhanced active travel will then reduce the need for local car travel/dependency. This will require policies that create dedicated, fast and safe cycle routes of the type common in other European counties, and a few parts of the UK. Policies should also promote integrated public transport that improves reliability and increases usage, and further reduces car dependency. Policies also need to promote the installation of on-street EV charging infrastructure to enable people who don't have off street parking to charge their EVs

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?

Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively. Distribution Network Operators (currently transitioning to being Distribution System Operators, with wider responsibilities for the distributed grid) are keen to work with Local Authorities in developing their local networks to meet a net zero carbon future. Government money is available for investing in this grid infrastructure and Wiltshire Council needs to work with the DNOs/DSOs to ensure Wiltshire gets the grid investment needed to achieve net zero for our county. The main focus should be on upgrading grid capacity and infrastructure in the right places to enable renewable energy generation, EV charging and any other investments needed to help deliver net zero via the electricity distribution network.

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?

Reduce housing numbers to a sustainable level that will allow net zero emissions to be achieved;
Develop a genuinely sustainable spatial strategy that does not promote and is not dependent on commuting;
Reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
Take an employment led approach (not a housing led one that works against achieving net zero targets);
Measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
Develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
Place proper value on natural capital and account for it in the Plan.

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

The current proposals work in the opposite direction, particularly in terms the higher-level strategy, which seem to be driven by road building and a focus on commuter housing. The planners appear to have been given the answers the Council requires, and then retrofitted the Local Plan accordingly. This is not the correct way to go about planning.

Rep ID: Climate77	
Consultee code: Other	Consultee Organisation (if applicable): Wiltshire Climate Alliance
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes it is, so long as we choose the right courses of action and actually take them!	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
- Given the amount of agricultural land in Wiltshire, I suspect the scale of emissions are not truly reflected in this analysis. Even if it is, agriculture can still play a significant role in carbon reduction and storage. Working with farmers to manage soil in an environmentally conscious way (e.g. no/low till, cover crops, reducing chemical inputs) should be a key part of the Local Plan.	

- With transport representing 40% of the county's emissions, there should be a focus on supporting sustainable transport. For example, increasing frequency and number of routes for trains (reopen stations on existing lines!) and buses.
- The plans for significant roadbuilding schemes are extremely concerning as these will only encourage further reliance on private vehicles, increasing carbon emissions whilst removing land that could otherwise help mitigate emissions.
- Build houses to net zero standards on land which will have the least impact on biodiversity/carbon storage (e.g. brownfield sites).
- Don't build 5000 more houses than the identified need!

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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

Rep ID: Climate78	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Defence Infrastructure Organisation
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

The majority of ideas set out in the Policy Theme box relate to standard development measures such as flood risk assessment and incorporating SuDS into development. There is only one bullet point that refers to natural floodplain management. We would wish to see this worked up into a far more comprehensive approach that looks at an integrated solution to biodiversity gain and flood management as per our response to Question B2. Nature-based solutions to water management need to be an integral part of the policy and designed and implemented at a strategic landscape scale. The role of natural wetlands in absorbing nutrients also needs to be highlighted in this policy theme and built into the sustainable water management approach.

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?

The ideas in the Policy Theme box relating to Biodiversity Net Gain are welcomed, however, we would like to see these measures worked up into an ambitious approach planned at a landscape-scale. As both a developer and a landholder, MoD would wish to see development of a spatial strategy for biodiversity offsetting that commits sites for the purposes of long-term BNG. Compensatory sites to deliver BNG must deliver gains in accordance with existing / evolving biodiversity priorities and conservation frameworks such as Nature Recovery Networks and the Porton to Plain project. The theme of biodiversity net gain also needs to be woven throughout the document and emerging local plan policy as an integral part of climate change adaptation. For example BNG and nature-based solutions are not mentioned in the box for Policy Theme 1, however, natural floodplain wetlands can deliver substantial biodiversity benefits as well as reduction of nutrient input to rivers. For example, we would wish to see mention of BNG and nature-based solutions woven into future revisions of Core Policies 67 (flood risk) and 68 (water resources), however, there is currently no mention of biodiversity in the gap analysis in the table in Appendix 1a relating to these policies.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate79	
Consultee code: General Public	Consultee Organisation (if applicable): None
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes; the Plan needs to focus on not creating additional emissions, then work on reducing what already exists. Policy framework needs to address this. We need to re-think what is realistic and achievable based on scientific evidence that worst case climate predictions are happening now. WC cannot be stuck in last century thinking.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Focus on improving cycle networks and public transport. The systems and infrastructure need to change first, and be reasonable for people to use; a cycle path that stops when the road gets "difficult" is not going to encourage users to cycle. No matter how	

much an individual may want to cycle, or get the bus, if it is not possible due to safety, or a lack of bus services, then the only option will be to drive.

Planning policies need to be clear that any construction needs to be carbon negative. Policies need to protect valuable agricultural land, and consider a future where food security is paramount. Our children will not thank us for destroying the countryside to build cheap, badly insulated homes, if their biggest worry is food insecurity.

Policies need to support renewable energy generation - and find ways to generate (not just store) when the sun is not shining. We have a river, we have windy hills, they can all be used, it all adds to the mix.

The Plan needs to take into account actual population growth; birth rates are falling well below 2, so our population will start to decrease. For example, Chippenham has already grown at a vastly faster rate than the population of the UK, and should the planned 7.500 additional houses go ahead, the town will have grown 4.5 times faster than the UK population. This really is the definition of unsustainable.

The Plan should NOT be used to prop up WC's ailing financial position - people who live here should not have their county trashed by WC financial incontinence.

Mortgaging our children's future to balance the books is wholly unacceptable

A3: How should these actions be delivered and measured?

All actions should be delivered by a sensible framework of policies, and by engaging the public in decision making. The recommendations of the Climate Emergency Task Force should be followed, and implemented in a manner that recognises the urgency of the Emergency - the big clue being in the name.

The county's carbon footprint need to be assessed, and annual targets for reductions set, to be measured annually, and reported back. An independent board should oversee the implementation of policies, made up of lay members of the public.

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

No, not far enough.

The county already has a problem with flooding, new development will add to that. Whilst the carbon emissions of the county are being brought under control, there should be no development on green field sites - there are plenty of brown field sites, and the fallout from Brexit & Covid will mean many additional office and shop spaces will need to be re-purposed. All this needs to be considered, before a single blade of grass is destroyed.

Wishy washy language such as "where technically feasible" give developers a green light to ignore SuDS, because it's too difficult & costly.

Policy should encourage residents to harvest rainwater, the same for public buildings, and implement measures such as rain-gardens to abate flood water flows.

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?

No, not far enough.

Development can not provide a 10% biodiversity net gain - seriously - have any of you ever seen a new development? The county needs to make better use of blue & green infrastructure, making it accessible to the public, preserving what we have and enhancing what we have by encouraging more wildlife & rewilding.

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?

No, not far enough.

Homes need to be carbon negative, including construction materials. Anything built on a brownfield site needs to make best use of the available space.

Policy should be to ban all greenfield development until all other options are exhausted (and not just to the developer's satisfaction) unless the carbon content of the soil, and the biodiversity loss can be accounted and mitigated for.

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?

Zero carbon would be acceptable as an interim measure. Carbon negative would be required for 2025 onward. It's perfectly possible to do this - WC just need to have the will. Housing exists. It may cost a little more, but a home with no heating bills, for ever, would be incredibly attractive to many people. Developers may need to take a cut in their excessive profits - but they also need to remember that they can't eat money, and there are no profits on a dead planet.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

The alternative to zero carbon is far too costly. Any suggestion this can't be afforded is based on greedy developers wanting huge profits. As above; we can't eat money. No new houses on a dead planet.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Alm to implement the highest possible standards, in line with recommendations form relevant parties, including CETG

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Yes, of course! It is absolutely vital that homes are made as energy efficient as possible, so that the amount of renewable energy required reduces. This should be supported by Policy

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?

No, not far enough.

We need to be able generate power in winter, and when the sun is not shining, i.e. when our energy needs are highest. There's no point using GSHP & ASHP if the electricity used is not renewable. Storage also has an implication for sustainability, and short term high demand solutions need to be included.

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

Policies should encourage a broad mix of technologies, and should seek advise from experts

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?

Yes, the Plan should set targets. They should consider the energy requirements of the Plan Areas, and set targets accordingly. Energy efficiency measures would need to be taken at the same time, so that as energy use decreased, the renewable generation increased.

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?

All possible steps should be taken to retrofit all buildings. Policy should seek advice from experts on the appropriate measures for they type of properties impacted.

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?

No, not far enough. Switching to electric vehicles does not solve the problem - just shifts the issue elsewhere. The key focus of policy should be to reduce the number of vehicles in use, by improving transport & cycling links, as well as protoing vehicle sharing and hiring schemes.

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?

Policy needs to encourage increases in public transport, implementation of cycle lanes that have priority over vehicles. Switching to EVs is not the solution; half the carbon footprint of the average vehicle is embedded in it's manufacture, so the number of vehicles need to be reduced.

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?

Policy should encourage renewable energy generation that generates when solar does not. EV is not the solution in the ling term, only a shift away form privately owned cars will help.

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?

Policy needs to ensure that "schemes" are designed with people in mind, not developers, and how much money they can make

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

WC need to start taking the Climate Emergency seriously. Even Sir David Attenborough has recently told world leaders that 2021 is our last opportunity to prevent runaway climate breakdown. WC has had a Core Policy for years that talks about increased flooding, increased summer heat, and huge rises in average temperatures. Read your own documents - read them & understand them! This won't go away because it doesn't fit the WC budget. And when your kids, or grand-kids ask what you were doing in 2021, when we still had a chance to save the biosphere from runaway climate breakdown, what will you tell them?

Rep ID: Climate80	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): North Wessex Downs AONB
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
less talking and more doing. Look beyond the baseline for reducing carbon emissions including change in perceptions, travel habits of residents, accessibility to greener transport and better network of Green Infrastructure. Working with landowners for improving framing practices and carbon capture, not just a case of planting trees. Enhancing existing biodiversity sites as well as creating new and extending existing sites.	

A3: How should these actions be delivered and measured?

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

No, its a good start but this is what the LPA should have been encouraging 5 plus years ago. Need to work with other partners (land owners and organisations) to maximise potential for tackling Flood Risk and promoting sustainable water management.

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?

net gain should be higher in the AONB where biodiversity is a special quality and a reason for designation. Clear guidance should be provided for audits in terms of the baseline (ie, measured before a site is cleared)

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?

Its a good start but landscape designation needs to be considered, for example large window openings provide optimal solar gain but also create additional light spill which impacts on dark skies a special quality of the AONB, some renewable energy types such as wind turbines or solar panels have the potential to cause adverse landscape impacts. policy should be worded to encourage alternative energy generation where appropriate.

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?

yes

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It shouldn't but developers will make out it does to maximise profit margins

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Yes but again be considerate to the designated landscapes within Wiltshire and context of local area.

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?

Wind turbines and field scale photovoltaic panels have substantial and significant adverse landscape impacts. These large-scale energy generators should, therefore, be located outside of the sensitive landscapes of the AONBs and the settings.

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate81	
Consultee code: Other	Consultee Organisation (if applicable): Swifts Local Network: Swifts & Planning Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

No, because the DEFRA biodiversity net gain methodology overlooks urban biodiversity that uses buildings, e.g. bats, swifts, sparrows, starlings, pied wagtails, and wildlife including insects that uses existing green roofs; it also gives no value to providing artificial nesting and roosting spaces such as swift bricks, bat boxes, and bee bricks, and also hedgehog highways. Protection and enhancement measures for this building-based wildlife needs to be specified separately in the Local Plan, in line with NPPG Natural Environment Clause 023, and also the Living With Beauty report by the Government's Building Better Building Beautiful Commission (30/01/20) which recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110).

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

We support retrofit and modernisation but the Local Plan should include a policy that procedures must be in place to protect urban wildlife, both with long-term biodiversity in mind, and ensuring works meet the 1981 Wildlife and Countryside Act, e.g. with regard to breeding birds.

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate82	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>I write to express my dismay at the Wiltshire Council 10 Year Local Plan. At a time when the county, the nation and the world are facing the significant threat of climate change the WC plan for the future is woefully unsuitable to address the problems we face as a result of rising carbon emissions. In all the significant areas of activity the Council has oversight of, the Plan fails to provide any real answers for how the county is to achieve the Council's stated aim of becoming carbon neutral by 2030.</p> <p>The Local Plan deals with subjects such as energy use, energy production, transport, housing, road building and the Westbury Incinerator. In all these areas the Council fails to provide any leadership or creativity in finding meaningful ways to reach carbon neutrality before the end of the decade. Indeed, many of its proposals will actually increase the county's carbon emissions over the next nine years. This plan is not fit for purpose and is not in keeping with the Council's own position when it signed up to recognising a Climate Emergency, which it did in 2019.</p>	

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

In supporting the Wiltshire Climate Alliance stance on the Council's 10 Year Local Plan I would like to propose the Council accept the following observations and take the subsequent suggested actions:

Despite this democratic mandate and the legislative and planning framework, the proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, and indeed the proposed approach to development, particularly housing and roads, will significantly increase the county's emissions. The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this.

The Spatial Strategy section is driven by Government housing targets using an out-dated formula from 2014 and includes an additional 5,000 houses on top of the 41,000 required by this formula. The structure and location of the proposed major housing developments will inevitably increase dependency on private cars, requiring further road developments and associated transport emissions. The Spatial Strategy does not quantify any of these emission impacts, nor does the supporting Sustainability Assessment. The Local Transport Plan section admits that its projections of future traffic volumes are based on out-dated assumptions, and fails even to mention how climate change policies could affect future traffic patterns. The Climate Change and Biodiversity Net Gain section makes some relevant points but these are not reflected in the Spatial Strategy or in specific policies elsewhere in the Plan.

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

We believe the Plan needs to include a calculation of the County's carbon footprint and contain year-on-year targets for how this will be reduced. All proposed developments must have their emissions impact quantified and the cumulative impact compared to these targets.

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is only genuine need, rather than being driven by out-dated, top-down targets;

- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable and avoiding building on greenfield sites wherever possible. Retro-fitting at vast additional expense is not a viable or sensible option;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

This Local Plan is the best, and last, chance for Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations. I believe that the current proposals for the Local Plan must be completely rewritten on this basis.

The position we are all in is extremely worrying and only radical and innovative measures will give us any chance of seeing Wiltshire achieve a carbon neutral status by 2030. This is the time to act and I hope the Council will revise its Local Plan in order to provide the necessary actions so desperately required of it for the sake of the planet and our children.

Rep ID: Climate83

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I am writing in response to the Plan to which I object on the following grounds:

- Planning for new housing developments must be focussed where there is genuine local need – not for long distance commuters
- Housing should be sited to avoid environmental damage – on brown field sites wherever possible
- Wiltshire must develop planning policies that require housing and commercial development to be built to zero carbon standards
- Planning must use the opportunity to reduce fossil fuel car dependency by including transport links, bicycle lanes, and pedestrian and electric care infrastructure
- Any large volume road developments need to avoid proximity to housing because of the adverse health impacts of car emissions
- There needs to be a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation) which is not currently mentioned anywhere in the Plan
- There needs to be a policy to promote carbon capture including
 - oProtecting and enhancing the carbon absorption properties of the natural environment including significant increases in tree planting, also helping to improve biodiversity
 - oProtecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms
- There needs to be an overarching planning policy that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets which need to be explicit and connected to policy including the Climate Emergency Task Group

Rep ID: Climate84	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The pie-charts derived from SCATTER appear to be defective, and cannot possibly reflect the contribution from land use in Wiltshire. Perhaps they are based on CO2-only measures. The all-UK emissions from agriculture and land use are around 10%. This is an average, and for a rural, agricultural county the proportion would be higher, not 4% as reported. Initial calculation suggest a figure of around 12%.</p> <p>So, emissions from land use are significant, and need to be taken into account. They should be re-assessed, perhaps with different measurement systems. Can the Plan deliver outcomes that are both significant and realistic? In terms of contemporary politics, no; these two requirements are contradictory: you cannot make major reductions without being unrealistically radical or dirigiste. Nevertheless, the WC should say so clearly, and note its lack of powers to make the necessary changes.</p> <p>The broad reasoning is as follows: A rapid decarbonisation programme entails a shift to land-intensive resources. This means that rural areas have a disproportionately large role to play in generating sustainable energy, producing low-emission foods, and</p>	

restoring biodiversity. Presently most of Wiltshire's land is occupied by grazing livestock and the production of food for them and other, non-grazing stock. Two thirds of agricultural emissions arise from livestock, for less than 20% of the food, and this component must be addressed to reach zero emissions. But of course, we can do better than that: a steady switch away from high-emitting livestock to other low-emitting and carbon-sequestering processes, using the same land. A ten-year plan is required. It should be remarked that this is not really controversial. It is covered in the recent CCC report.

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

This question seems to have been formulated to permit an easy escape-route. "Significant" can mean anything from 5% to 100% reduction. 5% is relatively easy, but if the aspiration is 100%, let us assume that this is what 'significant' means.

A clear-sighted perspective shows it cannot be done within the Council's powers. However, the Council can analyse, measure, and lay out plans that would work, physically, while acknowledging that the main drivers need to come from elsewhere.

The required pattern is logical, coherent, and is not controversial in expert climate circles. High-emitting activities have to be reduced wherever possible. No gratuitous increases should be allowed. Very-low-carbon substitutes must be introduced in energy and food. Negative emission process should be implemented wherever possible. And offsets out of the county should be explored.

It is worth noting that, given that many of the required processes are land-intensive, and Wiltshire is land-rich relative to its population, the County must super-comply; that is, it cannot merely meet its own needs: it must export surplus.

Here are some back-of-the-envelope estimates. If we take the SCATTER value of 3.465 MtCO₂e/yr, one third of this will be reduced by national processes, giving 2.3 Mt/yr. Attention to the land use sector could reduce this to 2.1 Mt/yr, and decarbonisation of the WC's own estate could leave us with a round 2 Mt/yr. This is largely generated by fossil fuels, mostly buildings and transport. These have to be replaced by ultra-low-emissions sources of energy, some in the form of storable and transportable fuels. By way of illustration, say 50% of the energy is to be met with solar, 40% by wind and 10% by biomass. To reduce emissions to zero, the County would need

- 8200 hectares of solar PV, 2.4% of the county's area
- 49 wind farms of ten 3 MW machines, in key elevated locations
- 16000 hectares of dedicated biomass crops, about 4.6% of the county's area.

Are these 'practical, achievable steps'? Physically they are completely practical and achievable. Politically, perhaps that is another matter, but this is a measure of what the WC would need to do even to approach its stated goal.

A3: How should these actions be delivered and measured?

Measurement usually comes first, but can be difficult and usually done via proxies and pro-rating national statistics. Probably a clear and credible audit would be needed at the outset. Possibly the SCATTER tool, although official and standardised, is too coarse and might be distorted by political considerations.

A phased plan needs to be generated, costed and widely discussed. There will be strong opposition to any such plan as a whole, but also to specific details. It will be politically difficult, but without grasping these various nettles, the Declaration will have no meaning.

Is there any way out? Two possibilities suggest themselves. One is offsetting, that is, financing low-carbon process outside the county. This has the obvious political advantage of being 'out of sight, out of mind', but might also have cost and carbon advantages in that many remote locations have superior energy regimes to those of Wiltshire. An example would be investing in wind power where the mean wind speed is 9 m/s rather than Wiltshire's 7 m/s. Since energy generated is proportion to the cube of the wind speed, this would double the output.

Another possibility is for the WC to settle for less than 100% reduction of emissions, and focus on biodiversity. Biodiversity and 'ecosystem services' are seriously threatened and constitute the 'other sustainability crisis', which tends to be upstaged by the climate emergency. There are many measures the County could undertake that will improve biodiversity, and perhaps this could become 'Wiltshire's USP': what the county is doing uniquely to lead the way in biodiversity policy.

Biodiversity is harder to measure than emissions, but making a serious difference can be just as challenging. It would entail restoration of many ancient habitats and the establishment of wildlife corridors. Large parts of the county should become re-naturalised or 'rewilded'. Again, this is politically difficult, but demanded by the simple logic of sustainability.

For any of these processes there would have to be 'milestones' showing that the plan is on track to deliver by the target date.

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

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?

It depends on the measures of biodiversity adopted. If Biodiversity is especially promoted as 'Wiltshire's Contribution' as a partial alternative to decarbonisation, far more radical measures would be required. There is widespread rule of thumb: NATURE NEEDS HALF. Are you approaching this standard?

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?

They would not. The WC needs to specify that all new buildings must comply with zero-emission standards.

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?

The Welsh Government adopted the target for 2011. The National Government adopted it for 2016. Neither were delivered, but it was obviously deemed technically possible. That is the new, unavoidable standard. It is achievable.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Yes, if you ask the developers. Their problems are greater and their profits smaller if they are required to build zero-emission homes. But you are the Planning Authority. You set the rules. You might be surprised at the new developers who turn up willing to give it a go. They might be a lot better to deal with than the Old Lot, if not so much fun to go drinking with.

Consideration should perhaps be given to coherent settlements, rather than infill and 'just houses'. Such settlements could be located and designed in such a way as to minimise need for commuting and private vehicles. Energy demands could be rationalised, for example with district heating. Components could be prefabricated and assembled on site. Prospective tenants can contribute in various ways. Costs can be low.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

See discussion above. The proposed measures are milk-and-water. You need to have robust metrics, clear goals, and milestones. You need to tell everybody why. You will need to demand that the central government back you up. It is not the end of civilisation, but it is a decisive change of direction.

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

What are 'all technologies'? There are not very many options. It might be worth considering nuclear power, and discussing it seriously, perhaps in order to put other solutions into context. It might be useful to set up Citizens' Assemblies to debate the pros and cons of various low-emission energy sources. That would help planners get some idea of the balance of opinion, but in the end, if the Declaration is to mean anything, you will have to go ahead.

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?

In the light of previous points, you cannot possibly approach the 2030 target without vigorous development of renewable energy. You need to agree a broad framework and rates of installation, and set intermediate targets. The measurements are fairly straightforward in terms of installed capacity. For example if 4150 MW of solar are needed by 2030, and 1460 MW of wind power, it is simple to break these up into tranches to create (say) two-yearly milestones.

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?

Probably listed and 'sensitive' buildings should be left unscathed. There are not enough of them to make a big difference, and they are too precious to be messed about with. For other buildings it is usually more cost-effective to reduce their demand, rather than to retrofit renewable energy supply systems, which are expensive on a small scale. While such measures are highly visible and make it look as if things are happening, generally their cost-effectiveness is poor. One exception might be the application of heat-pumps in suitable cases, usually air-source, an important part of the central government's overall strategy. This might entail replacement of radiators inside houses. Consideration should be given to district-heating, using large-scale heat plants, perhaps deriving heat from water bodies such as rivers.

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?

Air quality in Wiltshire is good, and probably needs no direct attention. This is a quality-of-life matter rather than one of sustainability. Having said this, the switch from fossil fuels to electricity, and from ICE to electric vehicles, will themselves result in air quality improvements.

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?

Some people are entirely used to public transport and feel comfortable with it. Most others are deeply committed to private vehicles (for many reasons) and often have more than one per household. Once a vehicle is owned its sunk costs press it into service for any journey, even those better served by public and active transport. While it is admirable to reduce the number of car journeys, strong effects can be obtained by reducing the number of cars, probably best pursued through car-share and car-club schemes. These can best be promoted by stressing their many benefits relative to household car ownership. Any town with more than 5000 inhabitants could run a car club based near the centre and accessible to subscribers. Car clubs combine well with bicycles, and cycling facilities could be part of the mix.

Some 'nudging' could help the emergence of car clubs, for example providing club-only parking spaces, while restricting parking for other vehicles. Town clutter is not only the result of vehicles being driven, but of the 90% simply lying idle on the streets. This is valuable public space, and should not be handed over free to car-owners.

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?

This question reveals a general lack of understanding about the level of renewable installations required to meet to target. An ambitious plan needs to show clear targets and milestones, and will entail substantial changes to the grid, which will be happening at the national level as well. By 2030 Wiltshire would be a far more electric region, and will need much stronger distribution systems.

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?

The most general impact is that no scheme should be pursued that does not maximise reduction. Therefore, for example, no buildings should be permitted that do not meet zero-emission standards.

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

I will follow the numbered commentary sections, but I would like to make a few general remarks. I am sure the Council is aware of the gravity and urgency of the climate situation, and the closely-associated problem of biodiversity. This presumably is the point of choosing 2030 as a target for net-zero emissions, twenty years ahead of the national target. This suggests that Wiltshire's intention is to move faster, and contribute more, than the transformational plan produced by the government's Committee on Climate Change. The central government's programme is demonstrably too slow, which is disappointing, but understandable in the light of what is politically acceptable and sayable. In this respect, Wiltshire's more radical target seems refreshingly realistic. Yet the proposals in the Plan document do not match the requirement. Indeed, the changes discussed appear to be even slower than those proposed at a national level. Again, this is understandable, but as a resident of Wiltshire, and of the UK, and indeed of the planet, I would like to try and spell out what would be required to meet the Council's expressed target.

Part of the problem is that the powers of local government are limited, and many of the required changes imply legislation at the national level. It would be a helpful part of the process if the Council could identify what needs to be done, but acknowledge it lacks the necessary powers. Then decision-makers and interested parties will have a better idea about where responsibility lies.

Rep ID: Climate85	
Consultee code: Other	Consultee Organisation (if applicable): Drews Pond Wood Project
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A way must be found to achieve this. The Council has declared a Climate emergency. If action isn't taken now it will be too late. The consequences of not acting now will be disastrous and unacceptable and even more difficult for planners and policy makers to deal with in the future.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Ensure that the objectives in this document are woven into the rest of the Local Plan. Seek out Local Authorities that have already found practical and achievable working practice.	

A3: How should these actions be delivered and measured?

Can WC collaborate and work with other Local Authorities who have found ways to do this?

Better baseline information is needed. E.g. more resources should be put into biodiversity surveillance if we are to know and understand what is to be protected and how.

Baseline information will need to be robust. Appraisal will need to be frequent, as the climate situation may change rapidly from predicted patterns and actions may be required to adapt.

Baseline information and appraisal should include biodiversity. The impact on habitats and species needs to be measured.

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

Predicted changes in rainfall and temperature may prove to be an underestimate as natural processes are triggered by climate change. The measures outlined are reasonable, but must be adaptable if flooding risk or drought becomes worse than expected. Wider areas may need to be included as flood risk and it should be possible to reverse housing allocation if this occurs, rather than ploughing on regardless. Efficient use of land for development is essential. Reducing housing numbers is the obvious way to reduce flood risk and the government should be challenged about the amount of housing imposed on Wiltshire.

The impact of these factors on biodiversity should be considered. It is important to avoid development sites that would alter hydrology to the detriment of habitat. The National Trust has just brought out a report on the risk to heritage assets of climate change. Impact on heritage sites should be given consideration.

Water supply should be considered. Additional housing will increase water consumption and must not be allowed to impact on important river habitats by over abstraction.

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?

The document states that protection is covered by Core Policy 52. We have not found this to be the case. Developers have not identified nearby designated land when submitting proposals; developer survey has been poor and has not met requirements; detailed information about protected species provided in the form of legitimate survey by well qualified independent experts has been ignored; Councillors have ignored the recommendations of the WC Ecologist, and poor decisions have been made by Councillors who have no expertise or interest in biodiversity issues. Resulting mitigation recommended has been a token gesture that will not compensate for loss of habitat.

There is a danger that overall enhancement will be a licence to damage biodiversity. The Local Plan needs to do more to ensure that robust protection is actually in place. If a species or habitat is lost, it cannot be enhanced and this objective becomes pointless.

More surveillance is required to identify what needs to be protected and enhanced. It is important to monitor the impact of measures on a regular basis. If rare species or habitat is found during the planning process that need to be protected it must be made possible to remove allocated sites rather than just attempting inadequate mitigation.

Ecology is complex. It is hard to see how 10% net gain can be quantified -this is very subjective. The loss of some rare species would be impossible to compensate for. Habitats and species have evolved over thousands of years. We are only just learning about the complexities of the relationship between various species that make up a particular community in a particular habitat. It is too simplistic to think that we can easily achieve a net gain and this is a dangerous approach that is open to abuse.

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?

We welcome the measures. Such measures should have been in place years ago, and it is urgent to ensure that these steps are followed now. All proposed development needs to go through a Carbon Impact Assessment.

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?

A way must be found to achieve this. The Council has signed up to the Climate emergency pledge. All proposed development needs to go through a Carbon Impact Assessment. We agree with the approach to seek out examples of good practice, and find out how zero carbon developments have been achieved by other Authorities. Working with groups like the Good homes Alliance UK or the UK Green Building Council who promote and encourage good practice within the sector will give insight.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Change is needed. Developers make huge profits. The planning system is weighed in the favour of the developer. How have zero carbon developments have been achieved by other Local Authorities? There are viable schemes in existence. Working with groups like the Good homes Alliance UK or the UK Green Building Council could encourage more widespread good practice.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Looking at the ways that other Council's have achieved this is a good way forward. Can advice be sought from organisations with speciality in these matters –Friends of the Earth, Energy Savings Trust?

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?

We support the measures set out.

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

It would be important to check out that technology will actually reduce carbon. Some biofuel technology may actually have a high carbon footprint, damage habitat or take land out of food production. Burning waste is not acceptable. Expert organisations such as Friends of the Earth, or the Energy Savings Trust could be consulted.

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?

Consult with expert organisations e.g. The Centre for Sustainable Energy.

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?

Consult with expert organisations e.g. The Centre for Sustainable Energy, Energy Savings Trust.

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?

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?

Set carbon reduction targets for transport. Provision of better, efficient reliable, affordable public transport services is needed. These services require serious investment. Stop accommodating car use by improving roads and increasing road space. Invest in making walking and cycling safer instead. Rethink transport policy in the light of the pandemic. Find ways to encourage this behaviour to continue. People have experienced how pleasant it can be to have traffic free streets and will hopefully be more open to leaving their car at home. This should be capitalised on. The benefits of clean air, safe places for children to play, quieter streets that are safer for cycling and walking need to be promoted.

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?

Ideally green energy for housing such as solar panels or heat source pumps should provide some relief to allow the grid to cope. Larger scale green energy schemes such as solar panel farms are needed to increase the grids capacity. Solar panels could be put on factory roofs for example – this is done in Germany.

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?

Answer: Seeking out examples of good practice, and finding out how zero carbon developments have been achieved by other Authorities is a good way forward. There are viable schemes in existence.

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

We support the majority of the proposals in this document. It is hard for us to give answers to some of the questions asked. Knowing the best way forward to achieve the goals set out requires technical expertise. Seek out advice from expert organisations, working with other Local Authorities, and possibly using consultants is the best way forward.

Rep ID: Climate86

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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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?

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?

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

The proposed Local Plan should be rejected for the following reasons, a future proofed climate action plan should be embedded in any future proposals – There is no plan B. In 2019 Wiltshire Council called a climate emergency, this plan completely ignores this very real threat.

1. This plan doesn't align to the Government's 'levelling up' strategy, where job opportunities need to be created outside Southern England, indeed the basis for HS2 – distribute communities and employment. There are empty dwellings in other parts of the country that could be utilised and those areas revitalised to provide sustainable communities with employment, infrastructure for health, wellbeing, education, connection (human and transport). Southern England is losing its green spaces and natural landscape that supports biodiversity, agriculture and food security, carbon sinks, air quality etc.

2. The Government's 'building back better' agenda isn't reflected in this obsolete plan (post covid-19 pandemic, post Brexit) and huge expenditure for HS2. The local plan should be revised in accordance with the UK development strategy and indeed neighbourhood plans should be part of the overall Wiltshire local plan. Urban communities need green space. This has been much reported during lockdowns and is a genuine and evidence-based health and wellbeing need for the future of communities and individuals. Chippenham town centre won't be able to support this large expansion. The result will be development of satellite retail units, taking more business out of the town centre with the need to travel by car. Northampton is a prime example where due to over- development, the market town centre has died through not being able to support the now huge community which uses Milton Keynes, generating thousands of unsustainable 40 mile round trip car journeys. There are many such cases of this in the UK and clearly, Chippenham shoppers will gravitate towards Bath and Bristol resulting in a very stark future for Chippenham town centre. WC needs to be smart and learn from previous developments by other county councils and focus on the promotion of its indigenous agricultural resources. The overarching objective of WC appears to be build, build, build indiscriminately, whether WC is consulting on the LP, climate change and biodiversity or rural communities. How are other agendas, needs, risks considered in the whole picture – impacts of increased development on natural habitats, protection of our green spaces etc?

3. Warehouses are being built near J17 of the M4 that bring little employment and more transport. This is just the start of consumerism driven development resulting in the loss of agricultural land. This needs to be resisted and controlled to avoid catastrophic development, as has been allowed to happen in Northampton.

4. There are no employment opportunities, growth of employment uncertain as is Dyson's footprint locally. It will be a commuter estate with increased traffic congestion and pollution. There is no evidence of the carbon footprint of the Local Plan.

5. By 2030 Wiltshire to be carbon neutral - this plan works in the opposite direction, giving rise to increased traffic and pollution and less green spaces.

6. No specific detail how Wiltshire strategy will support the climate emergency it has declared. Planning legislation should align with climate strategy and deliver carbon reductions. Local plan is far removed from sustainable planning. A number of proposed

development areas in Chippenham and Malmesbury are on or adjacent to flood plains that should not be built on. Flooding has been assessed as a great risk in this area by WC, that is likely to worsen.

7.WC want to sell farms for huge profit: a biased and unsound process that the people of Chippenham do not want. There is no consideration of the future of Wiltshire's families and the valuable countryside completely lost with the planning proposed. Once it's gone, it will never be replaced or reinstated. Beautiful spaces removed forever – total destruction of the countryside.

8.650 acres of prime farmland being tarmacked/concreted over. WC should support the farming industry and local production of food. Wiltshire is an agricultural county that provides many jobs. All planning needs to enhance nature not destroy it.

9.WC to get a £75 million award from Homes England - destruction of high-quality farmland should not be dictated by this fund.

10.Neighbourhood plans are being ignored by developers whose objective is money not community needs.

11.Residents not completely aware of plans, unable to view physical plans due to Covid 19 and many people isolating.

12.Youth members of climate alliance spoke of fear for their future.

13.Is there a housing crisis in Chippenham? To build 9225 houses in Chippenham will have a disproportionate increase of 109%. No relation to Chippenham housing needs/no justification for additional 5,000 houses. These are massive urban additions. ONS 2014 data obsolete.

14.There should be a reassessment of housing need, brownfield sites (including offices, retail units) and MOD housing should be included in the figures. WC should focus on existing sites before allocating sites for further development.

15.The local plan should be based on real and current data (e.g. ONS, employment streams, transport needs and modes, infrastructure needs (health care, education, elderly care) agriculture and food security, environmental etc. impact analyses and forecasting of the specific needs of this rural county to sustain its rural nature that in turn limits climate change and supports the vital environment through diversity of insects, animals, plant and tree species.

Rep ID: Climate87	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Winsley Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
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.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
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.

A3: How should these actions be delivered and measured?

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.

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

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.

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?

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.

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?

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?

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?

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.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

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.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

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.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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 be undermined when the project does not take account of the whole building envelope. 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 effectiveness of a policy change can be measured. Without knowledge of all refurbishment work, it would be very difficult to measure the impact of this proposed policy change.

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?

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.

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

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.

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?

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.

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?

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.

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?

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.

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?

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.

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?

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.

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?

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.

Rep ID: Climate88	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
From your policy themes it looks as if goals, achieving outcomes and how is well thought through. They should make a good impact in reversing carbon emission trends. Also you say other organisations have set out how to make steps and measure them, and that Local Plans can write in good outcomes. It could be helped by some trends from the pandemic, homeworking is likely to continue to a certain extent which will have a good impact on travel.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

The things you have said in your 5 themes – all are good, and all will make a difference

A3: How should these actions be delivered and measured?

Not qualified to answer. Can things be learnt from other local authorities or organisations who are already on this path, and are measuring and reporting back

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

I don't feel well qualified, but I think yes. If flood risk is taken seriously and looked at pro-actively. Sustainable water management also essential for construction of new schemes.
Flood risk: Tree planting – very useful for taking up water; beavers (only in a suitable location for them) their work gets the water to stay longer on the site before it leaves, so there isn't just a surge onwards of water. Meadowland richer in biodiversity also good at sequestering carbon.

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?

I think they are good. I think you can do more with Wiltshire's rural land, it sequesters carbon, and that can be increased (see above). Involving the local community would be good, if they feel part of it there is more likelihood of buy-in / support.

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?

Looks good, yes.

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?

It is a worthwhile goal to aim at so definitely put it as one. Achievable if the Council sets zero carbon as what has to be done but you will have big developers not wanting to change, though one has said it is working towards zero carbon.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not really if building is planned better, to take better advantage of the site, the geography and the weather ie its design can make it more energy efficient. Re-using materials, keeping waste to a minimum (for example) help keep emissions lower and would also lower costs. It is possible to design better than we the big builders do now. Not everyone wants a many-bedroomed, many-bathroomed house. Something simpler for individuals, couples, people downsizing. Varied types of housing development that is more appropriate to the range of people who live in villages, towns etc.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Whatever best allows you to achieve a good uplift.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Too tricky to answer in a small box. First, whatever is done has to be suitable for the fabric of the building, it is not straightforward, and you don't want a solution to turn out to be a bad thing for the building. ?Have workshops in villages and towns and propose simple solutions (do something about heat loss through the cat flat, do simple homemade double glazing), get people to share what they have done, have Green Homes events bringing people together. Not too expensive solutions though, many can't do that.

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?

I think they look good. Yes

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

The second one. You don't know what new technologies might appear, leave it open that if useful ones come along they can be added in

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?

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?

See 7. Take care that the solutions don't do harm, or trigger off a new problem. Technology sometimes dishes up a simple solution, one size fits all, but buildings are very varied. Conservation Areas and Listed Buildings – some buildings can have many ages and types of construction within them, Bradford is a case in point. Steps: First understand your building. Next find out how significant a difference the proposed action will deliver, is it worth it or better to look at another action. Make a long-term plan, prioritise what when

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?

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?

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?

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?

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

Rep ID: Climate89	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>I believe the LP must explicitly and unequivocally state the following:</p> <ol style="list-style-type: none"> 1. The climate crisis, and the related ecological and biodiversity crisis, are near-term existential threats with no equivalence in the history of humankind. 2. We have no option but to significantly reverse existing emissions trends. We must not query whether it's achievable, or comfortable, - the depth of the crisis we are in means we must achieve it. 3. We are at a sharp turning point in history. We cannot base our actions now on what we have always done. A gradualist approach that seeks to build on precedent and 'move towards' lower emissions, within the constraints of what is perceived to be achievable without undue disruption, will fail. Radical change, whilst undoubtedly uncomfortable for many, is now absolutely essential. 	

4. The personal disruption and cost to all citizens will be significant in the short and medium term. There will be significant political and personal cost for Wiltshire Councillors. Many of the changes that must be made are likely to create backlash and resistance from many individuals and groups in the county, since long-established norms and ways of living will have to change rapidly. Overcoming resistance to change must itself be recognised as an immense challenge.
5. Making radical change can and will also change the lives of Wiltshire residents for the better, and not just in the context of long-term viability of the biosphere and the prospects for humanity, but in the context of short-medium term improvements in health, air quality, community cohesion, wellbeing and fitness, and citizens' enjoyment of the natural world.
6. The costs of change in the short and medium term must be understood and measured against the longer term cost of failing to slash net emissions to zero well before 2050. Failure to reduce emissions to this depth, and at this speed, will lead to a catastrophic outcome which will render any short-medium term political difficulties or uncomfortable decisions wholly irrelevant.

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

The role of the Council must therefore be to understand the need for radical change, then articulate a compelling vision of a net zero carbon county, and then provide unwavering leadership in bringing about that change. Unwavering leadership will mean stating the urgent need for change, winning arguments about the balance between short term cost and disruption vs long term benefit, and pushing change through whatever the political cost.

Based on the above, I offer the following specific comments on the text of the 'Addressing Climate Change and Biodiversity Net Gain through the Local Plan' paper, referencing paragraph numbering:

- 1.1 Suggest replace "Robust scientific evidence suggests that..." with "Robust scientific evidence demonstrates unequivocally that..."
- 1.2 Suggest adding the fact that "More than half of all CO2 emissions since the start of the industrial revolution in 1751 have been emitted in just the last 30 years, and the rate of increase continues to rise" (figures from Carbon Budget Project presented by Our World in Data, "Cumulative CO2 Emissions by world region, 1751-2017. <https://ourworldindata.org/grapher/cumulative-co2-emissions-region?stackMode=absolute>.)
- 1.6 Suggest adding the fact that the sum total of all current Nationally Determined Contributions (NDCs) declared by signatories to the Paris Agreement, including the UK's commitment, will fail to contain global heating to the target 1.5 degrees above pre-industrial level, or the 2.0 degrees fall-back position, but are likely to lead to a global temperature rise of around 2.3 - 2.6 degrees (see:<https://climateactiontracker.org/global/temperatures/>) Also add the recent quote from UN Secretary-General António Guterres, referencing the publication of the Initial NDC Synthesis Report (26 February 2021): "2021 is a make or break

year to confront the global climate emergency. The science is clear, to limit global temperature rise to 1.5C, we must cut global emissions by 45% by 2030 from 2010 levels. Today's interim report from the UNFCCC is a red alert for our planet. It shows governments are nowhere close to the level of ambition needed to limit climate change to 1.5 degrees and meet the goals of the Paris Agreement. The major emitters must step up with much more ambitious emissions reductions targets for 2030 in their Nationally Determined Contributions..." (<https://unfccc.int/news/greater-climate-ambition-urged-as-initial-ndc-synthesis-report-is-published>)

1.7 Suggest replacing final sentence "Achieving this will be challenging, but the new Local Plan will have a role to play." with something like: "Achieving this represents an immense challenge, greater than anything the county has ever faced in peacetime. The new Local Plan will be pivotal in achieving this."

2.1 Suggest add a new section 2.1 ahead of the review of international and national policy, to set context, along the lines "The international and national policies identified below must be understood in the context of the Keeling Curve - that is, the graph of CO2 concentration in the atmosphere over time which shows that, irrespective of successive policies and laws that have been put in place to mitigate climate change, atmospheric concentration of CO2 shows an unbroken, and indeed accelerating, rise, ever since consistent measurements were first taken in the 1950s (see: https://scrippsco2.ucsd.edu/graphics_gallery/mauna_loa_record/mauna_loa_record.html)

A3: How should these actions be delivered and measured?

2.3 Suggest adding a new 2.3 to explain likely climate impacts that don't arise within the territory of Wiltshire - that is, global population migration, pressure on food production and supply chains, introduction of new pests and diseases.

2.3 Suggest replacing 'adaption' with 'adaptation'.

2.4 Suggest make clear that offsetting must be seen as a) a last-resort measure after all possible carbon reduction measures have been exhausted, and b) offsetting must be additional to any existing carbon removals within the territory.

3.1 Suggest replacing "It is considered that now is an important time to influence the design of policies that in recent decades have potentially not gone far enough to adapt to and mitigate the acknowledged effects of climate change." With something like: "It is now vital that we radically change policies that have, to date, been wholly insufficient in their effect to adapt to and mitigate... etc".

3.2 and 3.3: Suggest emphasising that the Council, far from merely doing what it is required to do by national policy, instead intends to flex the interpretation of national policy and guidance such as NPPF and RTPI/TCPA to its absolute limit to ensure that Wiltshire's Local Plan is at the leading edge of what is legally possible in taking radical action to tackle climate change.

3.13 Suggest making it clear that Wiltshire Council intends not merely to take account of sound strategies drawn from the LPs of other authorities, but to push the envelope in arguing for a far more ambitious and far-reaching set of policies, and expend considerable effort in developing robust arguments to support such a strategy in public examination.

4.5 [note that para numbering 4.5 is duplicated - this comment relates to the second para numbered 4.5] Suggest replace “The intention is to review the current policies in themes, to understand the extent to which they contribute towards tackling climate change, and where the gaps are.” with something like: “Wiltshire Council is clear that policies contained in the current LP have been overtaken by the urgency of responding to the climate emergency and are now, by definition, wholly inadequate when measured against this. We recognise that all policies require root-and-branch change, and we intend to review policies in themes, wherever necessary starting with a blank sheet of paper”. I agree that a whole new climate change objective is required, and it is more accurate and consistent to describe this as a 'climate emergency objective’.

4.7 Suggest adding a recognition of the fact that the continually strengthening evidence on the speed of climate and ecosystem breakdown means that even the most ambitious policies contained in other Authorities’ recently examined and adopted LPs are behind the curve in terms of the speed and depth of response required. Therefore, whilst it is useful to refer to leading Authorities LPs, these must be understood to be useful only a starting point, and that Wiltshire Council should seek to go far beyond other Authorities in the tone and ambition of its LP which must be commensurate with the urgency of response required.

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

4.10 I agree with the broad points made. Suggest an introductory bullet point setting out the Council’s provisional intention and vision for this section. This ought to state that all new development must be net zero carbon both in embodied carbon terms and in operation, as per definitions provided by the UKGBC. Furthermore all domestic developments should be net energy positive, meaning that they are designed to generate and export more energy over the year than they consume (at least regulated energy). Very significant effort should be made to identify and require the use of material that can deliver a zero embodied carbon building, principally timber.

4.11 The bullet point relating to community renewable energy initiatives is unclear - it seems to suggest that community initiatives may achieve renewable generation with less impact, or demand, on the electricity grid. This is not the case, unless the community energy initiative focuses on demand side management.

4.11 Suggest this section should be much clearer in setting out the Council's ambition for renewable energy generation in the county. This ambition should reflect the responsibility that rural authorities have to host the maximum possible renewable energy generation since urban areas of the country are unable to contribute in the same way.

4.11 This section should reference the NPPF Feb 2019, recognising that the 'avoiding adverse impacts' requirement of para 151a must be challenged, by setting short term adverse impacts against the vastly larger long term adverse impacts of failing to cut emissions at unprecedented speed.

4.11 NPPF para 151b should be acted on to identify the widest possible areas of the county in which the suitability of both wind and solar, at both small and large scale, should be confirmed.

4.11 The Council should be clear that it does not intend to use NPPF para 154a (small scale projects provide a valuable contribution) as a lever for favouring small scale schemes over large scale.

4.11 On footnote 49 to NPPF para 154b, relating to wind energy, Wiltshire Council should take a highly principled stand, and contest the meaning of this provision with the inspector. The footnote requires consultation on wind schemes to demonstrate that the proposal has local backing. There is a fundamental issue here of intergenerational justice. It is not acceptable for adults alive today to block wind energy schemes on the grounds of visual intrusion, when future generations cannot be consulted over their loss of life chances, wellbeing and hope in the event that emissions are not rapidly and drastically reduced. The question over wind energy approval should be re-framed, so that it no longer asks the current generation whether they like it, but an independent commission asks whether future generations need it.

4.12 The Council should set out here a bold and far-reaching vision for low-carbon, active travel dominated settlements. Instead of a gradualist approach to encouraging EVs, the Council should explain and defend a vision of Wiltshire's cities, towns and villages in which the primary and dominant form of local travel is by bike, walking, and electric assist, and set out the scale of infrastructure investment and change to bring that about.

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?

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?

No, the Council should go further. New development should be net zero embodied carbon and net zero carbon in use, as per UKGBC definitions. New domestic development should be net energy positive, meaning the buildings generate more energy over the year than they consume (regulated energy).

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?

Yes, it is achievable. There is an increasing body of guidance coupled to recent examples of developments that have achieved this level of energy performance. The LETI Climate Emergency Design Guide (<https://www.leti.london/cedg>) sets out how this can be done. The learning curve effect of the house building industry beginning to deliver low and zero carbon housing means that it will be increasingly cost effective to do this. Besides, the issue of 'cost effectiveness' is a concept rooted in the status quo, and the climate emergency demands that we abandon status quo thinking. New development must be zero carbon, and cost effectiveness of different build options must be measured against this absolute, not compared to an outdated model in which new builds are permitted to be inadequate from a carbon and energy performance perspective. Nobody demands to know the cost effectiveness of building a house that doesn't fall down in a gale, compared to one that does. Structural integrity is an absolute, not an option. Net zero carbon must be an absolute, not an option. The goalposts can move if we want them to - for example government has been happy to waive first time buyer stamp duty on new house sales, the value of which is in the ballpark of the additional cost to achieve net zero carbon.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Yes, but only in the short term. Building to these standards becomes cheaper as the whole industry adapts. The Council must be resolute in setting net zero carbon as an immovable target, and by doing so help to force faster innovation in the building industry. The paper by Currie and Brown for the CCC (see: <https://www.theccc.org.uk/publication/the-costs-and-benefits-of-tighter-standards-for-new-buildings-currie-brown-and-aecom/>) makes clear the likely relatively small (circa £5k by 2025), and

falling, uplift in build cost for a typical semi from current part L to achieve 15kW/m2/year regulated energy with an electric air source heat pump.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Focus on enabling a best practice approach across the county using something akin to Retrofit Works (see: <https://retrofitworks.co.uk/>), and adopting a Wiltshire brand that gives confidence and risk reduction for Wiltshire residents. This should be built on using independent, qualified and regulated retrofit assessors operating to PAS2035.

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?

Does not go far enough. Wording should be much more ambitious and much less tentative. The maximum possible land area should be identified for wind and solar production, and the planning decision process for these schemes should employ a 'Commission of the Unborn' charged with representing the interests of people who will not be born until the end of this century, and the century after. The planning question the Commission must answer, on behalf of future generations, is whether they would regard the inconvenience borne by their forebears (us), in respect of visual intrusion and change to land use and landscape, a reasonable cost to secure a survivable planet for them to live on. Such a Commission of the Unborn should be given dominant weight in the planning process.

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

All technologies, but with particular weight on large scale wind, being the most cost-effective renewable energy generation option. By investing in the most cost effective zero carbon generation options, more financial resource is preserved for use in very difficult and expensive endeavours, notably decarbonising the existing building stock and transport system.

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?

The long term goal of 100% renewable energy generation and consumption should be entrenched in the LP. There are detailed pathways explaining how this can be achieved in the National Grid ESO's Future Energy Scenarios report, see: <https://www.nationalgrideso.com/future-energy/future-energy-scenarios/fes-2020-documents>

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?

Building retrofit should take a fabric-first approach, and should take full account of the embodied energy and carbon of materials used in retrofit - seeking wherever possible to sequester carbon through the retrofit process (through use of, eg, timber and wood fibre or other natural insulation materials). From a planning perspective it should be recognised that changing the appearance of non-listed buildings in order to achieve retrofit of hard-to-treat properties should be accepted. For listed and sensitive location buildings we should accept that energy performance cannot be improved to the same extent that it could in non-listed, or less sensitive locations. There is still a need for such buildings to achieve zero carbon operation however, and this will be best done by a combination of low-disruption interventions around draft proofing and insulation where feasible, coupled to electric heating that takes account of the rapidly decarbonising electricity grid. Listed building guidance should be relaxed in the context of

temporary secondary glazing that will enable listed buildings with single glazed heritage windows to perform much better during the heating season.

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?

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?

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?

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?

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

I'm responding in a free form email because the word document you have suggested for structuring responses frames some questions in, I think, the wrong way. For example, for consultation question A1, instead of asking "Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030?", we have to start from the position of what it is absolutely essential to achieve (net zero carbon by 2030), and then the Local Plan has to rise to the challenge of setting out how it will be achieved. Secondly I would like to comment on parts of the paper which do not have a direct consultation question attached.

Rep ID: Climate90	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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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?

My comments cover all aspects of the Local Plan consultation.

Climate Change and Biodiversity:

The Plan covers the period up to 2036, a period in which the world needs to take decisive action to reduce carbon emissions if we are to avert the devastating consequences of uncontrollable climate change. While this is a global issue, every part of society needs to act, and Wiltshire Council has significant powers to influence carbon emissions in Wiltshire. The National Planning

Policy Framework requires Local Plans to 'take a proactive approach to mitigating and adapting to climate change in line with the Climate Change Act', which requires the UK to achieve zero carbon by 2050 and (in the 6th Carbon Budget) to reduce emissions by 68% by 2030. The Council voted in 2019 to seek to reduce Wiltshire's carbon emissions to net zero by 2030. Despite this democratic mandate and the legislative and planning framework, the proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, and indeed the proposed approach to development, particularly housing and roads, will significantly increase the county's emissions. The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this. The Spatial Strategy section is driven by Government housing targets using an out-dated formula from 2014 and includes an additional 5,000 houses on top of the 41,000 required by this formula. The structure and location of the proposed major housing developments will inevitably increase dependency on private cars, requiring further road developments and associated transport emissions. The Spatial Strategy does not quantify any of these emission impacts, nor does the supporting Sustainability Assessment. The Local Transport Plan section admits that its projections of future traffic volumes are based on out-dated assumptions, and fails even to mention how climate change policies could affect future traffic patterns. The Climate Change and Biodiversity Net Gain section makes some relevant points but these are not reflected in the Spatial Strategy or in specific policies elsewhere in the plan.

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

We believe the Plan needs to include a calculation of the County's carbon footprint and contain year-on-year targets for how this will be reduced. All proposed developments must have their emissions impact quantified and the cumulative impact compared to these targets. The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer-term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;

- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

This Local Plan is the best, and last, chance for Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations. I believe that the current proposals for the Local Plan must be completely rewritten on this basis.

Rep ID: Climate91

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

My comments cover all aspects of the Local Plan consultation. The Plan covers the period up to 2036, a period in which the world needs to take decisive action to reduce carbon emissions if we are to avert the devastating consequences of uncontrollable climate change. While this is a global issue, every part of society needs to act, and Wiltshire Council has significant powers to influence carbon emissions in Wiltshire. The National Planning Policy Framework requires Local Plans to 'take a proactive approach to mitigating and adapting to climate change in line with the Climate Change Act', which requires the UK to achieve zero carbon by 2050 and (in the 6th Carbon Budget) to reduce emissions by 68% by 2030. The Council voted in 2019 to seek to reduce Wiltshire's carbon emissions to net zero by 2030.

Despite this democratic mandate and the legislative and planning framework, the proposed Local Plan fails to include any meaningful measures to achieve material reductions in carbon emissions, and indeed the proposed approach to development, particularly housing and roads, will significantly increase the county's emissions. The Plan fails even to include a baseline calculation of the county's carbon footprint or any assessment of how the proposed developments will affect this.

Rep ID: Climate92	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Home Builders Federation
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Land use policies should be evidence based, realistic, viable and achievable. A sustainable pattern of development and an appropriate distribution of growth are important means to help address climate change, however there are limitations on the ability of land-use planning policies to addressing climate change. The Council is referred to the HBF's answers to Questions B2 – B6 below.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

A distribution of new development that delivers greater levels of self-containment and reductions in unsustainable travel patterns is a practical and achievable step to reduce carbon emissions. The Council is referred to the HBF's answers to Questions B2 – B6 below.

A3: How should these actions be delivered and measured?

No HBF comments.

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

The HBF agree that wherever practicable, it is important to incorporate Sustainable Drainage Schemes (SuDS) within planned development schemes.

The HBF also note that under Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management, the Council proposes that all new development should be designed in a manner that limits the daily consumption & disposal of water and supports the collection and re-use of rainwater and grey water. Under Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a “clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day” (ID : 56-014-20150327). The NPPG also states the “it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement” (ID : 56-015-20150327). The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.

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?

Under Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and Biodiversity, the Council proposes that all new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy.

It is the HBF's opinion that the Council's policy approach to biodiversity should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.

The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRS will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. Each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State. This will achieve the best combination of local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.

The Environment Bill will make provision for local decision makers to agree biodiversity net gain plans with developers. Where offsite compensation is required, Councils will be able to review developers plans to deliver compensation through local habitat creation projects. Where suitable local projects are not available, there will be the option for investment in nationally strategic habitats. The Government will make provision for statutory biodiversity units in the Environment Bill, which will be purchasable at a set standard cost. This approach will allow Councils, landowners and organisations to set up habitat compensation schemes locally, where they wish to do so, where this is not the case, the Government will provide a last-resort supply of biodiversity units. The Government's proposals for statutory biodiversity units will provide a recourse for developers and Councils, where local habitat compensation schemes are not available, therefore preventing delays to development.

The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill. The Government proposes to work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, in order to provide clear and timely guidance on understanding what will be required and when.

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?

Under Policy Theme 3 – Sustainable Design and Construction in the Built Environment, the Council is seeking to achieve net carbon neutrality by 2030. All new development should be designed to achieve net zero carbon standards. It is commendable for the Council to seek to make the County carbon neutral by 2030 but the Council's proposed policy approach should not conflict or go beyond the Government's proposals for Building Regulations. As set out in The Future Homes Standard consultation (ended on 7th February 2020), the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.

Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. Energy performance data has shown that around 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to just 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.

The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes.

The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) and Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. The second Part L consultation is published alongside the Government's Response. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period

will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025.

The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, which means that the Council will retain powers to set local energy efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. As set out in the Planning for the Future White Paper a simpler planning process improves certainty. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal.

Under Policy Theme 3 – Sustainable Design and Construction in the Built Environment, the Council proposes that the introduction of Electric Vehicle Charging Points (EVCP) should be tackled through land-use policies and aligned with initiatives being developed to support the Council's Local Transport Plan, as well the encouragement of active and sustainable modes of transport.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. The Government's proposed requirements will apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space (the Government's emphasis underlined). It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW fitted with a universal socket to charge all types of electric vehicle currently on the market.

It is the HBF's opinion is that the Council's policy approach is unnecessary given the Government's proposals for Part S of the Building Regulations. If the Council's policy approach is retained, the HBF consider that the physical installation of active EVCPs

is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

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?

It is not possible to achieve zero carbon from the anticipated date of adoption of the Local Plan in 2023. The Council is referred to the HBF's answer to Question B3 above.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

The Council's approach to the delivery of zero carbon new development will affect scheme viability. In plan-making, viability is inseparable from the deliverability of development. As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the LPR (para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the LPR is threatened (para 34). The viability of individual developments and plan policies should be tested at the plan making stage. Viability is a key issue in determining the soundness of the LPR at Examination. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound LPR and housing delivery targets not being met. Viability assessment should not be conducted on the margins of viability. This will be particularly important in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met. The Council's policy approach to zero carbon development should not compromise deliverability and viability. The Council's updated viability assessment should include additional costs for 2021 Part L uplift and Future Homes Standard 2025. The Government's estimated cost for Option 2 (interim step of 31% reduction in carbon emissions compared to the current Part L

2013 requirements) is £4,847 per dwelling. Currently, the full costs for Future Homes Standard 2025 are unknown (see HBF comments to Question B3 above).

The cost of EVCPs should also be included in the Council's updated viability assessment. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP. The HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Government's current proposal automatically levies a capped figure of £3,600 on developers for upgrading local electricity networks, therefore this figure should also be included in the Council's updated viability assessment (see HBF comments to Question B3 above).

Furthermore, there are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's updated viability assessment. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in South West of £18,470 per hectare of development based on a central estimate but there are significant increases in costs to £63,610 per hectare for off-site delivery under Scenario C. There may also be an impact on gross / net site acreage ratio, which should be considered in the

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should rely on proposed changes to the Building Regulations. The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council is referred to the Government's proposed changes to Parts L (Conservation of Fuel & Power), F (Ventilation), M (Access to & Use of Buildings), R (Physical Infrastructure for High-Speed Electronic Communications Networks) & S (Electric Vehicle Charging in Residential & Non-residential Buildings) of the Building Regulations and the Government's proposals for biodiversity gain set out in the Environment Bill. As set out in the Planning for the Future White Paper a simpler planning process improves certainty. The Council is referred to the HBF's answers to Questions B3 – B5 above.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

No HBF comment.

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?

No HBF comment.

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

No HBF comment.

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?

No HBF comment.

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?

No HBF comment.

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?

No HBF comment.

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?

The Council is referred to the HBF's answer to Question B3 above.

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?

The Council is referred to the HBF's answer to Questions B3 and B5 above.

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?

The Council is referred to the HBF's answers to Questions B3 – B6 above.

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

No further HBF comments.

Rep ID: Climate93

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Chippenham Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:

N/a

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?

Yes. It is possible for the plan to reduce dependency on car travel and to ensure future development is net carbon neutral. This would be in keeping with the policies being pursued by our Neighbourhood Plan (e.g. on climate change, sustainable transport and electric vehicle charging). Imaginative approaches to transport across Wiltshire such as developing and connecting new rail stations (Devizes Gateway, Corsham and potentially Hullavington) with frequent, reliable, low carbon road transport, park and ride etc. could make a real impact on reducing the use of cars in Wiltshire and relieving traffic pressure on Chippenham. Any new roads built must prioritise cycling over car use, as an incentive to travel by sustainable transport modes and reverse carbon emissions.

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

Please refer to our Neighbourhood Plan policies on carbon neutral development, sustainable construction, renewable energy, provision and enhancement of cycle paths, access to the bus network, electric vehicle charging infrastructure, biodiversity and green corridors as examples of policies we would like the Local Plan to emulate.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and policies such as the ones highlighted above. These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government and Wiltshire carbon reduction targets.

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

Avoid building on the low lying land adjacent to existing flood plains and within Flood Zones 2 and 3, and to reduce future flooding risk to other communities in lower parts of the Avon such as Melksham, Bradford on Avon and Bath.

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?

Avoid building on land that will destroy natural capital, which is finite and irreplaceable, rather than trying to mitigate the consequences.

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?

We would endorse the UKGBC approach and use of sustainability statements suggested, which we are looking to adopt in our Neighbourhood Plan Carbon Neutral Development policy.

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?

By undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible (i.e. from 2023 or sooner). We would like to see this policy adopted immediately.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Please refer to the answer given to B4

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities

from exceeding this standard, which many are already doing through their local plan policies. Please refer to our Neighbourhood Plan Carbon Neutral Development policy for further guidance.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It should have policies which support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps).

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?

All development should be required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset for any remaining operational emissions) with immediate effect if at all possible.

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. It should also accommodate future innovation in technologies.

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?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system support the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.” We therefore recommend that the Local Plan sets a net zero target based on an assessment of its carbon reduction potential and develops policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside sustainable development locations and carbon neutral development policy. A carbon inventory approach could be used to check progress.

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?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production in conservation areas and listed buildings, providing they are sympathetic to their setting and significance, and this balance should be maintained.

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?

A local employment-led development approach, and supporting policies, would prevent large scale commuting and sustainable travel options within sites, and would reduce the need to use cars for local journeys. Employment development should be for high quality attractive jobs in order to minimise out-commuting and deliver the best value for our communities. Policies to control the use of wood burning stoves/heating in densely built-up areas would help reduce non-vehicular air pollution. Increasing modal shift to public and active transport will not be achieved with the 'business as usual' approach to delivering cycling infrastructure or bus improvements as previously seen in Chippenham. A comprehensive strategy for cycling, walking and public transport is needed to fully analyse current, future and potential demands, and to set out how continuous networks will be

delivered. Even if this can only be delivered at the cost of the loss of on-street parking or vehicle access. Unless sustainable transport networks can be established which are as quick and safe as routes for motor vehicles, modal shift will not occur. Whilst the shift to greener fuelled vehicles will in part improve local air quality through the reduction of emissions, it is not an all-encompassing solution to our problems. More than half of the UK's electricity is produced through non-renewable sources, and if electric vehicle uptake expands too quickly demand for power will in the short to medium term likely come from coal and gas. Electric cars still take up as much road space as petrol cars - meaning they will still cause congestion thereby making bus travel slower and less reliable. Electric vehicles will still sit idle in parking spaces on the side of roads for most of the day, limiting highway space which could be transferred to walking and cycling infrastructure, and results in severance for pedestrians and reduces the perception of safety for cyclists.

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?

Install on-street EV charging infrastructure throughout Chippenham and in other parts of the county (particularly larger market towns) as soon as possible.

Whilst sustainable transport infrastructure can encourage some modal shift, it has to be complemented with travel demand management. Inexpensive and plentiful parking results in the use of private car being the easiest mode choice, even for basic trips. A policy is therefore required to seek a reduction in parking supply and an increase in the cost of parking.

Should the distributor road that will serve the proposed development in the south and east of Chippenham be formally proposed in the Local Plan then supporting policies will be required which limit through-traffic within Chippenham by implementing restrictions to private cars, and to transfer existing highway space to cycle, walking and bus infrastructure.

Consideration should be given to transport hubs at strategic locations, intercepting longer distance trips by private vehicle and providing sustainable means of onward travel to employment, retail, leisure and education.

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?

More local renewable energy generation and policies which support this. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively.

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?

Forward thinking policies of the type described above. Viability will quickly catch up.

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

We have heard concerns from the general public that the questions asked in this document are far too technical in nature, and difficult for them to understand and constructively respond to. Disappointingly, there may be a low level of public engagement on this topic for this reason. Whilst we appreciate the situation with lockdown, it could have been possible to engage with the public more imaginatively and interactively through online workshops/sessions or surveys etc.

Rep ID: Climate94	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Thank you for this excellent document showing the need for a carbon baseline and time series data on sector emissions, a new monitoring programme and mitigation and adaptation practices to be embedded throughout other policies in the Plan. Evidence surveys have been overtaken by accelerating Climate Change, covid-19 and the Revolution in Green Energy in 2020. Unless the strategy produced so far is re-written along the lines of this document it is not reasonable to assume the Local Plan can begin reversal.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Follow the steps outlined in this paper and more. It is achievable because there is much public support for writing the Plan to make it a priority throughout the Plan to protect carbon sinks, biodiversity, agro forestry, build the right houses that are actually needed in the right places, increase sustainable transport etc .
The Plan needs to drop the fantasy targets for housing numbers, building on flood plains and other environmentally sensitive areas and selling County Farms.

A3: How should these actions be delivered and measured?

There should be an effective new monitoring system that is able to be seen by the public. No more houses should be built unless they are energy positive/generating as well as energy efficient and built with strong materials to withstand climate change. The same goes for commercial buildings.
Mapping for biodiversity, carbon sinks etc to be done before any development is allocated.

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

No, the measures do not go far enough. There must be no building anywhere near flood plains. More needs to be done, for example to plant trees in the upper reaches of rivers to reduce the risk of flooding.

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?

No, GBI areas and areas for biodiversity must be mapped first and not left to developers to map. The concept of being able to develop part of an area for biodiversity in order to protect a small part of it is unacceptable. The need is to reduce carbon emissions by 8% a year and in the Lockdown Year only they were only reduced by 6% so there is a long way to go.

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?

No, because it is possible for all new homes to be energy positive/generating as well as energy efficient and this should be mandatory.

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?

Yes. Even though Government regulations are slow to come through, the expertise exists and there is nothing to stop Wiltshire Council insisting on zero carbon new development.
In the proposed Policy theme 4 the words “where practical and achievable” should be deleted. There is no give and take with Climate Change. If there are exceptions where it is not practical or achievable but still desirable, these exceptions need to be listed and should be very rare and not financial..

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No. We don't need to hear any more about viability from the big developers who are happy to leave people with expensive energy bills and the huge expense of retrofitting.
Viability should not be mentioned. It is not part of land use. Indeed it is only something that has been mentioned in recent years. Developers should not apply to build unless they have already calculated that it is viable for them to do so according to the policies.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should insist on the highest standards. The proposal to encourage the production of good building materials locally is welcomed.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Establish a list of firms in Wiltshire that can do the work well and list have them on the Council web-site so people can find them easily and rely on them. Show where there are pilot schemes eg those done by Wiltshire Council for their affordable homes. Give prizes for good work. Encourage more apprentices to work with the good firms.

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?

Further to the measures described, there should be a presumption against solar farms taking up land that is needed for so many uses notably among them agriculture and biodiversity. Instead storage should be on employment sites, possibly inside redundant buildings, and solar on roofs.

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

Encourage all technologies, particularly hydrogen.

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?

One way would be for each of the towns, service centres and large villages to be encouraged to have a way of producing and storing renewable energy.

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?

As mentioned in the paper, there are ways to do this sympathetically. Renewable energy technology is evolving rapidly.

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?

With a reduction in car travel and increased use of public transport, together with more EVs and lorries running on hydrogen, there should be a big improvement in air quality. But it is essential not to build any new roads as they encourage more cars and out commuting and to develop only where there is access to footpaths, cycleways and sustainable transport and space for trees.

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?

When buses and trains are serving the population efficiently, there will be an opportunity to reduce parking. New development should be where car ownership is unnecessary. Areas for car share should be provided. Bicycle parking has improved but more may be needed. There are still places where new Cycle paths and footpaths are needed.

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?

It would help the Operators if there are local energy schemes including storage already set up and retrofitting is in progress.

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?

There is no reason why the design should not be good and relate to the local area. Having good design is important in place shaping. Viability should not come into policies. Developers will need to adapt to a way of building that is dictated by climate change.

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

Rep ID: Climate95	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Wilts & Berks Canal Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
The revised local plan will cover a period expected to extend beyond 2030 while much of the development in the early years of the plan is already committed or consented. The plan may not deliver outcomes to significantly reverse emission trends in its timeframe, but it will help to set the direction. Policies should be ambitious to drive behavioural change and fully reflect the national objectives.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

The Local Plan should concentrate on larger developments where there is access to community public transport facilities and encouraging the population to choose active transport. A 'Climate Emergency Strategy Plan' could be a beneficial tool for the Council to summarise targets, the challenges Wiltshire faces, and the actions necessary to adapt and mitigate in response to climate change. Any underlined targets should be measurable, with a specified timeframe, to stay on track. The plan should be referenced in all subsequent documentation and action plans.

A3: How should these actions be delivered and measured?

SCATTER provides a good trajectory system in tracking location-based production emissions. This enables the opportunity to standardise greenhouse gas emissions. Continuous monitoring and analysis are key in establishing how efficient the actions are. The statistics generated will deliver a guide for a practical and coherent solution, as well as providing the Council the opportunity to align with international framework. All organisations and businesses should take full accountability for any actions implemented when addressing climate change and biodiversity net gain (BNG).

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

SUDs are not always sufficient on their own. Wider flood mitigation schemes and drainage schemes may give better protection to communities and rural areas. Canals can contribute to improvements and take flood water away. Canals can replace attenuation ponds and save developable space.

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?

The measures set out positively outline the importance of preserving, protecting and enhancing biodiversity. However, green/blue infrastructure development, flood control and drainage should be considered in an integrated fashion. The regeneration of the Wilts and Berks Canal is important in creating wetland and terrestrial habitats, and significantly contributing to BNG. Furthermore, it will provide a sanctuary for health and wellbeing for visitors to the canal.

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?

The measures addressing building design are positive but need to be backed up with measures to control the location of buildings, and their low carbon infrastructure (e.g., roads and services). The Local Plan should support the highest possible standards for new build and retrofit to any altered buildings. There is a strong focus on new builds and no mention of the potential positive impacts that brownfield development might have. Although retrofitting and brownfield development may be expensive, it will reduce the need for new land, minimising the impacts of new construction on biodiversity. Many of the sites have existing infrastructure (including roads and services), and BNG strategies can be incorporated into redevelopment. These sites can increase the value of land, bringing a range of socioeconomic and environmental benefits.

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?

As previously stated, the revised Local Plan will not extend to current developments that have already been accepted or committed to. Therefore, the plan may not deliver the outcomes in this timeframe. Revising current existing projects to ensure the most sustainable choice is made, achieving a low carbon value, will help to set up the direction for future development.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Although important, current building regulations may not be enough in the future when working towards achieving the goal of carbon neutrality. Implementing the Government's new proposed standards will ensure an energy-efficient and low carbon building design. The Council should go above and beyond these standards wherever appropriate and viable to achieve zero-emission homes in Wiltshire.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The Council should support the highest possible standards for new builds and retrofit to any altered buildings, ensuring the highest performance outcome in reducing carbon emissions.

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?

Setting the decarbonisation objectives into the Local Plan is an essential step but given that the plan will only directly affect a small proportion of the built infrastructure and the established economy during its lifetime it can only make a small contribution to the end objective.

The power of working with the local community to reduce domestic energy output and consumption should not be underestimated. This can be encouraged through educational resources, guidance and support for small businesses, and local incentives. For example, introducing a 'Clean Air Day', will inspire school children to learn and participate in decreasing their

energy consumption. Spreading awareness and understanding are key in connecting with the local population, enabling them to make the best-informed decision regarding their energy production, consumption and emissions.

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

Favouring and investing in all technologies with greener solutions will extend the opportunity to implement appropriate technology wherever commercially viable. However, it is vital to consider how reliable the technology is, any existing infrastructure in place, the surrounding land-use and the environmental impacts.

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?

Setting targets can be useful in guiding activities and keeping organisations accountable for their efforts. The Local Plan will provide a scope for target setting. National targets can be a good starting point, such as the UK bringing all greenhouse gas emissions to net-zero by 2050. This should be adapted and shaped where appropriate to fit Wiltshire's own goals. Monitoring the percentage decrease in the use of non-renewables will set a focused goal that is measurable (e.g., non-renewable energy dependency to be decreased by X% by 2030). Separate, more specific, goals could be set for transport and residential buildings.

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?

The Energy Hierarchy should be considered when confronting energy production in relation to retrofitting existing buildings. The classification will prioritise the prevention of unnecessary energy use, eliminating waste and improving energy efficiency.

Engage with other, similar-minded local Councils in England, such as Gloucester County Council and Somerset County Council. Both have comprehensive climate emergency plans and working in partnership will allow the sharing of solutions. The development of a network will also increase the capacity to adapt and mitigate climate change.

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?

The measures are a positive start however, there should be more engagement with the local community, establishing initiatives promoting cycling, walking, public transport and carpooling etc. For example, improving and expanding existing cycle routes where appropriate within the urbanised regions of Wiltshire. The Wilts and Berks Canal will offer a safe route for active transport, allowing people to use the towpath as recreation. Additionally, the vegetation running alongside the canal acts as a natural carbon sequester, further providing clean air to its surroundings.

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?

Public access pathways and cycleways should be improved to encourage active transport. There is a focus on electric and hydrogen-fuelled vehicles in the paper however, it is uncertain when these will be widely accessible in the UK. More electric charging points around Wiltshire will allow people to travel further distances using clean-fuelled vehicles. This should extend to the canal line, encouraging the use of electric boats on the waterways.

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?

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?

The viability of schemes will not be impacted to a large extent. However, design and planning processes will be more time consuming, requiring more thought, preparation and effort. Schemes that have already received approval could be reviewed to ensure the best possible outcome regarding energy production and consumption.

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

The Wilts and Berks Canal is a valuable waterway in Wiltshire, providing amenity, flood management and environmental benefits. Several aims of the Trust work in conjunction with the Local Plan in adapting and mitigation the negative effect of climate change. The restored canal will be unique and important to wildlife and the local population. Once completed, the whole canal line will offer opportunities for active use such as boating, cycling, and walking. Recreational activities such as kayaking, paddle-boarding and fishing will also be available. Ultimately, the towpath will be accessible for all to enjoy, improving wellbeing. The canal also establishes green/blue corridors which provide a safe passage route for many species between fragmented habitats. This will be fundamental to biodiversity net gain and improving the diversity of flora and fauna. The vegetation also naturally sequestrates carbon from the environment, providing the area in and around the canal with clean air.

Rep ID: Climate96	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/A
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I wish the following points to be considered in response to the consultation.

The Plan must include specific measures to reduce emissions, including:

- Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;
- Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
- Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
- Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

Wiltshire Council has an opportunity to truly address carbon emissions and biodiversity loss. I don't see any of those concerns being adequately reflected in this policy. I suggest the policy is completely re-written in line with the recommendations of the Climate Emergency Task Group.

Rep ID: Climate97	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Whiteparish Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Unlikely. Although any reduction is welcome.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Ensure that new development meets high environmental standards. Development sites to be located in areas close to workplaces to minimise commuting. Reduce development in locations poorly served by public transport. Improve roads to reduce congestion. Implement a strategy for installation of EV rapid charging points, ensuring that all accept contactless payment. Ensure all new development incorporates EV charging facilities. Consider the EV charging needs of residents without on-street	

parking: street lamp chargers, pop-up chargers and the like. Encourage use of renewable energy provision in both domestic and business developments.

A3: How should these actions be delivered and measured?

To deliver for housing developments; specify that x% of energy must be from renewable sources (and don't reverse when developers say they the development will become uneconomic). For businesses, rainwater capture for use in toilets, solar panels could be requirements for new business builds. Measurement could be by Survey on commuting patterns as in the SCATTER Analysis. Monitor changes in EPC ratings for buildings over time.

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

The measures envisaged seem to focus on 'encouraging' and 'promoting'; a more directive approach will be needed. Good to see a specific target for runoff rate, though. Flood risk needs to be managed through location of build - ie do not build on the water meadows which absorb flood water. Planning authority resists developers who will push for low cost housing in potentially flood risk areas if it is profitable.

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?

No. Natural capital relies on an all-round approach ie, build location; materials used; appropriate use of natural resources ; measures to reduce usage of scarce resources; and appropriate measure to manage waste outputs (eg recycling; incinerator to generate energy). One activity in isolation will not enhance the natural capital - but will make a start. Without clear measures it will be difficult to assess progress.

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?

Developers will argue that the measures required are not practical.

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?

No. Development costs will increase

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Developers will not build if they are unable to sell. Wiltshire Council will need to resist pressure from developers ("development becomes uneconomic because of x, y or z").

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

New Homes standard needs to be nationally applied to avoid disadvantaging local areas.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It will only happen through local subsidy. Use of grants and enforcement when planning conditions include measures. Many elderly householders living in older housing will not be able to afford to modify their dwellings

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?

Possibly. One instance makes very little difference to the target- requires a proper campaign. The phrase 'where practical and achievable' is a major loophole, however necessary.

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

All technologies proven to work should be supported. Technology is being developed all the time - and WC needs to be able to capitalise on that rather than restrict itself.

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?

A good idea to measure the success of a policy, but need to be achievable and well defined to avoid likely manipulation.

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?

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?

The national move to electric vehicles will significantly help air quality within Wiltshire. Provision of suitable and sufficient charging points is key.

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?

Public transport needs to be more frequent before people will switch from cars. Provision of buses, particularly from villages to urban areas eg salisbury is currently very poor.

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?

This is not an issue for local government. The electricity industry is confident that growth in electric vehicles can be accommodated. Planners should concentrate on making it simple to provide charging points and hydrogen refill facilities.

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?

Increase the cost. Some technologies such as heat pumps etc. work poorly in the UK.

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

Rep ID: Climate98

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I would like to request that the Local Plan be completely rewritten, and that a policy framework is introduced that comprehensively addresses the urgent need for year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth. As it stands, the Local Plan will not help Wiltshire to achieve Zero carbon by 2050, let alone 2030.

It is astonishing that the documents treating transport and housing are devoid of any detailed carbon reduction targets, whilst building new roads is considered in great detail. It seems that the approaches outlined in the document "Addressing Climate Change and Biodiversity Net Gain" have been siloed in that document; in other words, it is not very good. I can only assume that elements of the Council's administration have no real will to tackle Climate Change.

Specifically, I call for planning policies that require new houses being built to Zero carbon standards, and a much greater emphasis on reducing car dependency in new developments i.e. follow the Salisbury Transportation Plan 2018 Refresh.

Rep ID: Climate99	
Consultee code: Other	Consultee Organisation (if applicable): Eden Renewables
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>We welcome Wiltshire Council's focus in the Local Plan on the challenge of climate change and how it can help address the issue. Climate change is the biggest challenge facing Wiltshire, the UK and the world today, and so this needs to be embedded in all the papers out for consultation on the Local Plan; we will confine our response to this paper but our views apply equally to the other papers comprising the consultation.</p> <p>We agree that with the right land-use policies these outcomes can be achieved - to ensure all new development is sustainable, particular focus must be given to integrating energy efficiency, renewable energy and biodiversity in a holistic manner. We particularly agree with point 3.3 - that effective local plans can fully support the transition to a low-carbon future in a changing climate. We would go further and say they must.</p> <p>Not only does the UK have a target of achieving Net Zero by 2050, but Wiltshire has a target of Net Zero by 2030 - we need robust planning and land-use policies that put climate change and reducing carbon emissions above all other considerations.</p>	

The example of the recent decision by the LPA on the Cumbria coal mine is a cautionary tale - this goes directly against the provisions of the UK's Climate Change Act. We would not want Wiltshire to make similar mistakes.

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

Renewable energy generation is one of the lowest cost and fastest ways we have to decarbonise. It is essential given the anticipated doubling in demand for electricity by 2050 and the Committee on Climate Change's forecast that a quadrupling of renewable and low carbon energy generation will be needed by that time. The Local Plan should actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure.

This means working proactively with both commercial developers and community energy groups to identify sites and help deliver new sources of solar and wind energy, and battery storage. The last time this work was done was the CAMCO Report in 2011 - in 10 years the market conditions for renewables have changed substantially and this is now out of date. This should be updated to take account of changing technology and the higher priorities that climate change and sustainable development now command in local and national planning policy.

A3: How should these actions be delivered and measured?

While the generation of renewable energy at a community level is highly desirable and should be supported (point 3.9), it will not be enough on its own to tackle Wiltshire's carbon emissions. While many community groups do great work, since they rely mainly on volunteers, they do not always have the capacity or skills to deliver the scale of renewable energy that is needed to tackle the climate emergency. Large-scale commercial renewable schemes will also be required, with developers building support and local involvement for host communities into their plans - see below.

These large-scale schemes should have other essential outcomes embedded within them - for example supplying green power directly to high-energy use local businesses via 'private-wire'; providing the infrastructure needed for Electric Vehicle charging stations; building-in opportunities for energy storage to help mitigate the variable characteristics of renewables; and supporting and promoting biodiversity and ecology, which will help to sequester carbon as well as tackling the ecological emergency. The transition to Net Zero must also be a just transition; policies should ensure that local people have the opportunity to benefit from all forms of development. Renewable energy projects will need to bring communities along with them, by offering good

community benefits and the opportunities for local people to invest alongside other stakeholders - including the Council. Developers should also share this responsibility towards local communities and be prepared to work proactively and in cooperation with local groups in order to help them deliver their desired outcomes.

The Council should also consider developing its own solar and wind farms, and can also invest its own funds in renewable energy projects developed in the commercial and community energy sectors - as other local authorities are doing, for example Swindon, West Berkshire, Bristol, and further afield, Warrington, Thurrock, Leicester and West Sussex, to name just a few. While the SCATTER analysis is useful for identifying where Wiltshire's carbon emissions come from, we would also like to see analysis which shows the progress the county has already made in terms of direct carbon reduction through renewable energy generation and develop targets to build on that. These should not, however, be viewed as ceilings.

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

More broadly, development policy should encourage regenerative agriculture principles and soil improvements to increase the retention capacity of soils and thereby significantly reduce flood risk and improve crop health in times of drought.

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?

Notwithstanding the unfortunate use of jargon in the consultation document - not many people will know or understand what is meant by Green and Blue Infrastructure - we agree that all new developments should provide a net gain of 10% in biodiversity as a minimum, as is set out in the Environment Bill.

The recent Dasgupta Review highlights the economic benefits of Natural Capital which must be reflected in and integrated into the policies of the Local Plan.

We would like to see a standardised scorecard system used, such as is being developed in the solar industry by companies like Eden Renewables, to measure carbon sequestration, biodiversity and ecology on all future developments. It is also essential that this is monitored and reviewed on an annual basis to ensure it is continuing to deliver its objectives and is adjusted if necessary

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?

We completely agree that all new development should be designed to meet Net Zero standards. Developers and planners are capable of achieving these, as recent Net Zero housing developments taking place in Exeter, Swansea and Bristol have demonstrated. Whilst opportunities to incorporate renewable energy into developments should be taken up, in some cases, the development of stand-alone renewable energy schemes, which could be linked to developments via private wire arrangements, will be a better way of reducing their carbon footprint.

Every new home or commercial development should have Electric Vehicle charging points installed as standard. These should be accounted for in designs, just as parking spaces are. It is also important to consider opportunities for biodiversity and ecology in new build developments - areas of new planting and trees need to also be built into plans.

There should be a minimum requirement for the size of the electricity network connection per house to ensure it is capable of supporting EV charging and heat pumps.

Developers should be required to account for the carbon footprint of their schemes at the planning stage - in construction as well as in operation.

Retrofitting existing buildings is a much bigger challenge. The measures described should be considered a minimum. The council will however still need to look for other ways of decarbonising. This can be achieved with renewable energy developments such as ground-mount solar farms and wind turbines in other suitable sites across Wiltshire.

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?

It must be achievable. Once suitably high standards have become embedded into policy, if developers are forced to adhere to these new rules, the costs will inevitably fall - just as they have done in the solar and wind industry (see response to B15) - which will be beneficial for everyone.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No. Developers should be held to account for achieving Net Zero standards, and we believe that this should be a material consideration in planning. There are already examples of successful zero carbon housing developments in Exeter (at Pinhoe, as part of the Liveable Exeter Plan); in Swansea (the Parc Hadau scheme) and in Bristol; while developers such as Sero Homes and Octevo are delivering genuinely sustainable projects which are commercially viable.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The council should be bold, ambitious and implement its own high standards which go above and beyond what is legally mandated or any national guidelines.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Retrofitting existing buildings is a much bigger challenge. The measures described should be considered a minimum. The council will however still need to look for other ways of decarbonising. This can be achieved with renewable energy developments such as ground-mount solar farms and wind turbines at other suitable sites across Wiltshire.

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?

We agree with the paper that:

“A positive policy approach should be adopted to support all forms of decentralised, low carbon and renewable energy schemes. Where necessary, land for renewable energy generation and storage should be identified in the Local Plan and/ or

neighbourhood plans. All forms of renewable energy generation development must ensure that its environmental impacts (direct, indirect and cumulative) are, or can be made acceptable.”

Large-scale renewable energy generation schemes will be critical to Wiltshire achieving its Net Zero target by 2030. While it is desirable that the Local Plan and neighbourhood plans identify suitable sites for renewable energy generation, this should not however be used to restrict developers from identifying and bringing forward other sites that may also be viable and suitable for renewable generation during the life of the plan.

These may become more economically viable as the costs of renewable energy technologies fall, as the national and local grid is upgraded, and as developers are able to negotiate Power Purchase Agreements with large energy users, which allow them to both reduce their carbon emissions and save money on their energy bills.

Relying on integrating renewable generation into new housing developments, while desirable, is not going to be enough.

Wiltshire has an abundance of land which could be suitable for renewable energy generation, with the largest land mass of any English county. It also enjoys high levels of solar irradiation compared to most of the rest of the UK. It must make the most of these resources.

Nevertheless, it is still challenging to find good sites, due to limitations on the grid system and other constraints on planning such as heritage. The council must understand that clustering of solar farms around grid connection points is inevitable due to the constraints of economically viable grid connections. This should not be viewed as a negative but as a positive - Wiltshire can and should be making a big contribution to the UK's overall green energy generation. Clustering is not the same as cumulative impact. The low-lying nature of solar farms particularly means they can be assimilated easily in the landscape and they will also dramatically improve the biodiversity.

Examples where Eden Renewables is putting this into practice are:

Our proposed Forest Gate solar farm near Chippenham would generate enough renewable electricity for 12,000 homes, which would meet the demand of all the new homes proposed to be built as part of the planned Chippenham extension, as well as many of the existing homes on the east side of Chippenham. We are also advancing plans to install EV chargers near the site to benefit current residents.

Our proposed Leigh Delamere solar farm would not only supply renewable electricity to local residents, but we are aiming for it to supply the Moto Service station directly with green electricity and develop an EV charging hub linked to the solar farm near the Motorway services.

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

All renewable energy technologies should be supported. While Wiltshire is fortunate to already be one of the leading counties in the UK in solar generation, thanks to the availability of both space and sunlight, we are lagging behind in wind energy due to restrictive planning policies.

The large numbers of solar farms in Wiltshire also offer excellent opportunities for co-locating battery storage which can help to balance the grid and reduce energy costs and carbon emissions, and is particularly appropriate at solar farms as energy can be exported at night when they are not generating. Policy should therefore explicitly support battery storage technology, as it facilitates better utilisation of renewable energy therefore reducing fossil fuel use and emissions.

Policy should also explicitly support wind energy projects in order to boost Wiltshire's contribution and diversify its renewable energy technologies, especially as the county has a healthy wind resource.

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?

Yes. Targets must be specific, measurable and achievable. They need to be set in relation to a baseline and focused on overall carbon emissions reduction. Carbon savings data associated with different renewable energy technologies is widely available - and plenty of research exists to show that even large-scale schemes such as solar farms and wind farms repay the carbon associated with their construction within a year or two. Developers of renewable energy schemes always provide information on anticipated carbon savings.

Swindon Borough Council has already shown how this can be effective - having set a target back in 2013 to generate sufficient renewable energy to match the consumption of all its households by 2020, it has achieved this.

The UK government has a target to achieve Net Zero by 2050; its Energy White Paper published in December 2020 showed how renewable energy would contribute to that with a target of 3GW of new solar development every year, on top of an existing baseline of 13 GW.

Wiltshire has a baseline of 624MW of solar power, as of September 2020 (source: BEIS). Applying a similar metric, an appropriate target for Wiltshire would be 450 MW solar each year to get to net zero by 2030. However, any target should not be viewed as a ceiling, with all opportunities to generate renewable electricity in an appropriate way encouraged.

According to the SCATTER data, the total level of emissions in Wiltshire is 3.465m tCO₂e per annum. Wiltshire has already installed 624MW solar farms - this is enough to save, say, 275,000 tCO₂e. A target of 450 MW a year would save 189,900 tCO₂e a year, or 1.9m by 2030 - cutting Wiltshire's total emissions by almost half.

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?

We agree that "Support should be given to retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production." While this is harder to do in listed buildings and conservation areas, it is not impossible - organisations such as the National Trust and Landmark Trust have led the way and demonstrate that it is perfectly achievable. It will be more expensive, so the Council should look at providing grants to facilitate this. If the Council were to invest in its own sources of renewable energy generation, perhaps some of the profits could be ring-fenced for grants for retrofitting buildings in sensitive locations.

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?

The electrification of transport by 2020 should have positive benefits for air quality in Wiltshire. However, people need to be encouraged to switch to EVs as soon as possible (before the 2030 ban comes into effect), and ensuring there is proper EV charging infrastructure across Wiltshire will have a big impact on this. See further detail in our response to B13 below. The contribution of particulate emissions from commercial vehicles and HGVs also needs to be taken into account as these are going to be much harder to convert to green fuels. Hydrogen and biomethane fuels are still at the early stages and costs remain prohibitive for many businesses. Therefore, HGV routes need to be well away from residential areas, and planning for developments which may create large volumes of this type of traffic should take air quality effects into account.

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?

As a predominantly rural county with poor existing public transport links, tackling public transport must be part of the Local Plan. For example, it takes two hours to travel by bus from Calne to Marlborough, a journey of under 15 miles which takes just 25 minutes by car. There is no bus service at all on Sundays on this route.

The Plan must also promote better cycling and walking routes. Electric bikes also offer an excellent alternative transport solution - allowing people to travel longer distances and across hilly terrain that would not be viable by normal bike, so new e-bike routes should be included as part of transport planning.

Notwithstanding the desirability of self-contained communities for employment, commuting to and from work only accounts for 15% of overall transport emissions (Wiltshire Council data). People will still want to travel for leisure and social life. Given the size of the county and distances between settlements most families will still need at least one car. With the ban on fossil-fuel cars coming into force in 2030 Wiltshire needs to urgently ramp up its EV charging infrastructure, on council property, at places of employment, on private land, and integrated into new housing developments. For example, the new Lidl supermarket currently in planning near Calne only includes provision for 2 rapid EV chargers. This site is next to substantial new housing developments which do not have any EV charging built in - the Lidl site should be required to accommodate at least 10 times as many EV chargers, and destination chargers would be more suitable.

EV charging infrastructure needs to be properly planned taking into account grid capacity and appropriateness. Rapid chargers are needed at transport hubs, e.g. near main routes and motorways; destination chargers are more suited for shopping and leisure centres, and residential areas and places of employment should provide larger numbers of slow chargers.

New renewable energy developments also offer excellent opportunities for providing EV charging and can also contribute to the grid upgrades that may be required - these are being built into Eden's proposals for solar farms near Chippenham and at Leigh Delamere - see more detail above in our response to question B8.

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?

With proper planning the electricity grid should be able to cope with the electrification of transport. National Grid, the EV industry and electricity distribution and supply companies are working together on technical solutions such as Time of Use tariffs and Vehicle-to Grid which can mitigate these issues.

The council should inform the district network operator of their targets for EV charging around the county so that the DNO can be prepared even if they cannot upgrade in anticipation of future need. The Council and DNO should lobby government and Ofgem to allow the DNO to upgrade in anticipation of future need.

The development of large-scale renewable energy projects can also provide the additional grid infrastructure upgrades needed. Developers should be providing integrated solutions which address the need for EV charging infrastructure at their sites.

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?

As the solar industry has demonstrated so successfully, with the right policies in place zero carbon living is achievable and affordable for everyone. The cost for solar in the UK has fallen dramatically in the past decade - from around £350/MWh in 2010 (35p/kWh) to around £50/MWh (5p/kWh) today. This is due to a combination of good levels of support from government policy initially and innovation from the sector.

Wiltshire can look forward to a future of sustainable communities, with a fair and just transition to a net zero future, based on clean energy generation integrated with net-positive biodiversity - which brings health and economic benefits to all its residents. But it can only do this if the Council seizes the opportunities it is presented with now to create a bold and robust Local Plan that puts climate change and biodiversity at the forefront. We urge you to do so.

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

Rep ID: Climate100

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Thank you for the opportunity to comment on the Local Plan Review. Unfortunately perhaps through the difficulties of Covid 19 have not been aware of such a significant event happening within our County. I have tried to comment on two of your pointers but have also lost in the system several times so an email will have to serve for the rest of my comments.

I welcome your paper on climate change which sets out the challenge of carbon reduction and protecting the natural environment but do not understand why these findings are set out in an isolated manner rather than being the back-bone of the plan. There is a mandate to build more houses, provide opportunities for business and transport but all this needs to be within a climate change framework.

For example new housing in many areas (I am not sure about Wiltshire) are not being built with modern technology - good insulation, alternative technology etc. Landscaping of new development is poor and planting does not take into account the sorts of trees/bushes that will aid the reduction of carbon emissions. (I believe this may be due to the fact that there is a problem post build on maintaining public areas. The new developments are still largely reliant on the motor car for access to work shops and schools.

Roads need to be rethought taking into account local and national climate change policies. With perhaps more people working at home traffic flow may be reduced in some areas.

There needs to be electric charging points on each new estate to meet the needs of the residents. At the same time there needs to be incentives to residents to reduce their reliance on the motor car. Post covid there needs to be an encouragement to get people back on public transport. All housing areas need better pathways/ routes for the bicycle - reduced prices on electric bikes to encourage a reduction in carbon emissions etc.

On a local level food production needs to be encouraged - local shops need to sell local produce - there needs to be publicity to encourage people to eat locally and eat seasonally - at the moment many people cannot afford to do this. To make this work there must be protection of farm land and allotments which are being absorbed into the needs of more housing.

All new development should require a 'climate change assessment' to look at the impact for residents of Wiltshire and the environment generally.

Rep ID: Climate101	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Only if it is properly drafted and a more proactive approach is taken . Planning now to make significant policy changes from 2023 will enable steady progress in following years. Minor changes in policy in this plan will postpone necessary climate change adaptations to 2030 and beyond.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Measure existing carbon footprint and plan for reduction year on year. In respect of all new development, rather than seeking to reduce impact, there should be positive criteria e.g to be sustainable/to be carbon neutral in operation/ to positively generate	

own energy/to reduce private vehicle use/to promote biodiversity. To rebalance transport spending to support public transport and traffic reduction over road building.

A3: How should these actions be delivered and measured?

Review of all policies to ensure (3.12) that climate change mitigation strategies form part of all policies. Progress report on annual carbon footprint reduction. Annual report to the public showing progress in accessible format (c.f this consultation with 90 documents

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

These measures will only achieve progress if they form part of all related policies and aim for positive change rather than limitation of damage.

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?

Answer as B1

Example – Eastern Salisbury has a good “green lung” of open land around the city, used and enjoyed by large numbers. A proposed development of 135 houses would significantly damage this. Areas of green (and blue) resource need to be positively safeguarded, and alternatives e.g brownfield development actively promoted

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?

The consultation document makes it clear that sustainable development and renewable energy policies are lacking, so without these policies the answer is no. Those policies have to be not just permissive but have to positively support green options against others.

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?

Answer as B1

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Question too vague –what scheme? There are powerful commercial interests behind most development proposals and if it is made clear that those schemes will only progress if they meet key environmental criteria I have no doubt the schemes will be adapted to suit.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should aim for better than BS minimum. As before, positive changes made now will bring accumulating progress in future years.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This needs significant assessment of how those buildings can be best upgraded for the most effective result

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?

Only likely to be sufficient if applied early and proactively e.g working to reduce road usage rather than building more roads to meet traffic demand

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

Don't know enough about the different options, but one that seems to offer significant benefit is installing solar panels on office building roofs (see B10)

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?

Yes. Example – if solar panels fitted on an office roof then the amount of green electricity generated can be displayed publicly

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?

Insufficient knowledge to answer

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?

Same answer as B8

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?

First, have proactive policies. Discourage development that is going to inevitably going to increase car use. Encourage e.g bus connections to new development. Encourage new rail links (not mentioned in plan as far as I could see.

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?

Local developments need to provide vehicle charging and own generation of green energy

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?

See B5

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

Rep ID: Climate102

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Mere Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

On page 59 & 60 are examples of Reading & Cambridge Local Plan Policies relating to water resources. Similar policies in the Wiltshire Local Plan should be adopted. In Mere we have first-hand experience of the demands that extra development places on our rivers and waterways, wildlife and environment. Because of its geological position, Mere has a large underground aquifer and the Environment Agency issued an abstraction licence to Wessex Water in 1975 to take up to 9 million litres of water a day from our water source. This water is used to supply surrounding towns and villages in the local catchment area but it can sometimes be piped 25 miles away out to the north or to the west when demand is high. If development is to take place at the level expected by the government then water demand will rise unsustainably – we need to bear in mind that Gillingham is due to expand to a level equivalent in population to another Mere. Mere had a well-publicised and catastrophic drying episode in 2011 and since then Wessex Water has been working with Mere Rivers Group to mitigate low flow periods by reducing or ceasing export if and where possible and also diverting water from one stream to another. We will be left with completely dry watercourses and no water to support our wildlife if we are not careful.

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?

More or better local infrastructure – we have accepted a fair proportion of development in our small town over recent years. This has, however, resulted in an infrastructure problem that is not being addressed by S.106 agreements, CIL contributions or any other form of planning gain. The issues we are talking about are the pressures on our local GP surgery who is at capacity and cannot extend either in terms of building or human resources. The pressures on town centre car parks. The increased use of cars on rural roads because residents now have to travel to get to services that are being lost locally i.e. banks, building societies, (there is very little public transport in this area); pressures on local schools who will need to expand in order to accommodate more pupils, pressures on health & emergency services. This Town Council has had a number of large buildings recently converted into flats (our local bank and a large hotel) – we have not seen a penny of CIL for these developments because they are conversions and so we cannot make any infrastructure benefits to compensate for the added pressure of

increased population. We have also seen a number of new build individual houses but the developers have said that they are self-build (we know they are local developers and have no intention of living in the house) and so, once again, they have found the loophole to get out of paying CIL and we get no infrastructure benefit.

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?

The design of new homes & places - We need to build new houses, so good design is vital for ensuring that new developments are acceptable to the local community, as well as helping us to move towards a zero-carbon economy. It may be necessary to remove permitted development rights to ensure that good design standards are sustained.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate104	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<p>BIODIVERSITY NET GAIN and the LOCAL PLAN CONSULTATION</p> <p>The challenge for Wiltshire Council is to align local plans to the Climate Change Act which specifies net zero carbon by 2050 and a 68% reduction by 2030.</p>	

A robust plan can be developed enhancing the blue/green infra structure. By using the SCATTER tool the focus seems to be on urban settings, yet Wiltshire is a beautiful rural county with huge potential for increasing biodiversity, and a risk of real biodiversity loss – depending on choice of housing sites.

All plants sequester carbon so planting trees, hedges, grass leys, permanent pasture and ponds will contribute to the lowering of the carbon footprint. It seems a sensible approach to keep this footprint as low as possible in the first place. Building on brown field sites and protecting green field is one way. Boxes can be included on houses for those species under threat e.g. swift, house martin and bats. All sites should have a Habitat Regulation Assessment (HRA) to determine the cost to the environment. Dorset has one in place for any site over 0.1ha. Other areas of consideration should be the character of the landscape, the status of the agricultural land (1 – 3a is high yielding food production land), orchards, vineyards, geological and soil influences. It takes many years of organic matter to improve the structure of our soils which influences its water holding capacity. Planners should support those people working to improve the land in this way.

High nature value farming can be seen in parts of the Marlborough Downs where farmers have been working together to improve its biodiversity. Wiltshire Council owns numerous farms and is in a position to influence the blue/green infrastructure of these properties. They can be used as flagships to use improvement methods to agriculture as recommended by the National Union of Farmers and others to reduce their carbon footprint and be used to encourage younger people into farming through on site training.

Trees and plant life can help in the uptake of water, as our winters become wetter and help with cooling in hotter summers. (as predicted for Wiltshire by the Met Office). The right trees need to be planted in the right places. Peatlands are better carbon sinks and should not be disturbed. Wetlands help in flood management.

Natural England and the Woodland Trust have suggested targets for all areas of England, Wiltshire is in a good position to develop one. Larger trees sequester more carbon than smaller ones, oaks can live for hundreds of years and in Wiltshire are able to grow to their full capacity. Such trees deserve to have TPO's (tree preservation orders) as their carbon footprint is essential to help achieve net zero carbon. The county needs to have a tree planting and protection policy, with rigorous monitoring and enforcement.

Wiltshire is not an isolated piece of land, counties that border it influence our biodiversity. Connectivity is important through hedgerow and waterway management all should be viewed in the local plan for future growth. Soon the new stewardship scheme ELMS will be encouraging such plans.

Flood management is a countywide issue with an increase in wetter winters. Plans to help water retention higher up the river can have beneficial impacts lower down. There are several natural approaches, as Natural England highlight.

Salisbury Plain, used mainly by the Ministry of Defence is a wonderful area of mainly chalk grassland. The MOD have plans to become net zero by 2050 and will be planting woodlands around their bases, developing ponds and have a no mow policy to help to do this. They will also work with their farming tenants to improve soil structure and grazing regimes. (Richard Nugee).

Enhancement of the land is good for our health and wellbeing.

A3: How should these actions be delivered and measured?

Please see detailed answer to Q A3 above

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

NO

Flood management is a countywide issue with an increase in wetter winters. Plans to help water retention higher up the river can have beneficial impacts lower down. There are several natural approaches which protect and enhance biodiversity, as Natural England highlight.

Trees and plant life can help in the uptake of water, as our winters become wetter and help with cooling in hotter summers. (as predicted for Wiltshire by the Met Office). The right trees need to be planted in the right places. Peatlands are better carbon sinks and should not be disturbed. Wetlands help in flood management.

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?

No

Please see instead the measures set out in answer to Q A3 above

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?

No
Please see instead the measures set out in answer to Q A3 above

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?

This has to be achievable.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

This depends on the will of Wiltshire Council and developers to achieve zero carbon new development.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Again using the highest international standards for carbon reduction and biodiversity net gain

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?

No
Please see instead the measures set out in answer to Q A3 above

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

All technologies

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?

Yes
Again using the highest international standards for carbon reduction and biodiversity net gain

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?

Make use of the highest international standards for carbon reduction and biodiversity net gain

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?

No
Please see instead the measures set out in answer to Q A3 above

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?

Use the detailed and well researched measures set out by the excellent organisation: Transport for New Homes

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?

Use the detailed and well researched measures set out by the excellent organisation: Transport for New Homes

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?

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

The majority of people in Wiltshire care deeply about the environment, biodiversity, climate change, protection of the natural world and net carbon emissions which are all essentials that need to be included in Wiltshire's Local Plan. When considering all the responses from various campaign groups, organisations, town and parish councils and individuals, WC should also look at the sound advice and recommendations by the Climate Emergency Task Group and the Wiltshire Climate Alliance. Very importantly, the Government (and WC) need to eliminate major road schemes due to local and national climate change policies and the change in work patterns with people working from home created by Covid-19.

The Countryside Charity, CPRE, in response to Wiltshire's Local Plan Review, will be submitting evidence to show that Wiltshire is building more houses than needed (the majority on green field land) and that the number of houses proposed under the plan is a serious over-estimation. During the period 2017/2018 and 2019/2020 Wiltshire was required to build 5,506 new houses but 7,720 were constructed. The Government target for Wiltshire is 40,840 houses but WC is proposing to build 5,000 more than this target.

Rep ID: Climate105	
Consultee code: Other	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
This can be achieved by requiring fundamental changes to how new developments are laid out with a presumption in favour of alternative means of travel and economic policies which encourage local businesses accessible by bus, car or foot. Major effort to achieve shifts in consumption, personal and corporate, as a result of post Covid and climate change pressures on lifestyles.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

It should be a requirement for all new builds in Wiltshire to adhere with the governments Future Homes Standard or any new scheme proposed thereafter. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025.

But it is important to:

- Prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand: there should be a strong presumption in favour of developing brown field sites rather than developing green field urban extensions.
- Support for small businesses and start up hubs within the urban areas.
- Support local services, facilities and public spaces to encourage active travel such as walking and cycling.
- Ensure high quality broadband in villages as well as urban areas.
- Ensure the Local Transport Plan prioritises the green alternatives, including reducing the pre-sent car parking spaces within new developments.

All new housing should include as a standard:

- High insulation specification
- PV Panels or tiles
- Rainwater harvesting
- Triple glazing, ensuring recyclable plastics are used for UPVC options.
- Heat pump or similar rated heating systems
- Electric hook up points for cars and bikes

The reduction of carbon emissions by 2030 will require an approach which persuades the public that ambitious targets which meet economic, social and environmental objectives are essential for future generations

A3: How should these actions be delivered and measured?

Policies once established within the Local Plan, which must be in line with government Future Homes Standard, must be monitored and enforced. This is not the case at present as is shown by the summary in Appendix 1 of the Climate Change document, which shows a consistent lack of monitoring of the current plan policies since adoption. New national targets have been proposed and these should be incorporated at a local level as well.

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

Covered by others such as Wiltshire Climate Change Action Group, who. Who have commented widely on this area.

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?

Radical changes to development lay-outs with introduction of tree planting, diminishment of the present tarmac priority. Environmental Impact assessments need to be more robust and followed.

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?

It will not be enough to require developers to follow Eco construction guidelines or Design guidelines. They must be enforced. The Council must return to having its own Building Inspector (s) who operate under Council enforcement rules.

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?

Only achievable if the Local Plan is amended and becomes more robust.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

New approach to the Spatial Strategy, where recent and longer-term changes to lifestyles will dictate the way forward.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

It should be a requirement for all new builds in Wiltshire to adhere with the governments Future Homes Standard or any new scheme proposed thereafter. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025.

To summarise:

Although becoming law from 2025, we should be aspiring to build new homes now which are built to the Future Homes Standard. These homes will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards. Introducing the Future Homes Standard will ensure that the homes this country needs will be fit for the future, better for the environment and affordable for consumers to heat, with low carbon heating and very high fabric standards. All homes will be 'zero carbon ready', becoming zero carbon homes over time as the electricity grid decarbonises, without the need for further costly retrofitting work.

For any large-scale developments, it is incumbent on Wiltshire Council to ensure developers create a well-planned, sustainable places for people to live. The plan needs to set out clear and robust mechanism, with clear phasing and monitoring, to ensure that the development delivers all its sustainable elements:

The main characteristics are:

- a purpose-built new settlement
- a community with a clear identity and attractive environment
- it provides a mix of homes, including affordable and self-build
- planned by local authorities or private sector in consultation with the local community

As well as building new homes, the communities develop:

- job opportunities
- attractive green space and public realm areas
- transport infrastructure, including roads, buses and cycle routes
- community infrastructure, schools, community and health centres
- a plan for long-term stewardship of community assets

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The council could provide incentives to homeowners, encouraging retrofitting by offering grants, low interest loans, variable Council Tax (based on energy efficiency) and energy efficiency Feed-in-Tariffs (reward households for installing measures which would reduce their energy demand).

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?

Covered by others such as Wiltshire Climate Change Action Group, who are much more experienced in these matters.

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

We should encourage all technologies. Allow local communities to decide what they can accommodate or wish for without any presumptions in policies towards one type or another.

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?

There is no point setting targets which cannot be realised. Evidence would be needed to demonstrate that systems are in place which could approach delivering any targets.

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?

The council should encourage retrofit to existing buildings and provide incentives to homeowners, to retrofit by offering grants, low interest loans, variable Council Tax (based on energy efficiency) and energy efficiency Feed-in-Tariffs (reward households for installing measures which would reduce their energy demand).

For buildings within sensitive locations such as Conservation Areas and/or Listed Buildings there would be a need for a comprehensive home energy assessment to be carried out by an independent specialist assessor who should consider issues such as:

- The heritage significance of each home and listed status
- The location i.e., conservation area or AONB
- The local climate, orientation and exposure
- The energy performance of the home including the walls, roof, chimneys, windows and doors
- Its condition
- How well services such as heating and lighting perform
- The levels of energy use related to how the home is used and how often it is occupied

This would then dictate the best way forward in terms of retrofitting homes.

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?

The statement under Policy theme 5 that “Existing policies and strategies are effectively monitoring, managing and improving air quality” is not borne out by the facts.

In 2009 there were 5 Air Quality Management Areas (AQMAs) across the County, with 3 being in Salisbury:

The latest report – the 2020 Air Quality Annual Status Report (July 2020) reveals there are now 8 AQMAs in Wiltshire declared in respect of the annual mean objective for nitrogen dioxide:

It cannot therefore be considered that current policies or strategies have been effective in monitoring, managing and improving this situation. It is acknowledged in WC’s Air Quality Annual Status Report that traffic is the cause of the problem, and it is suggested therefore that a far more radical approach is needed to transport and land-use planning. A new approach to the balance between housing and employment location and availability.

Reduction in car journeys.

See B13 below, since these steps to encourage modal shift will also help to improve air quality.

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?

There should additionally be measures such as the following:

- Discouraging car ownership through the design and landscaping of new developments. Park-ing spaces for private vehicles in new development could be made available on a leasehold ba-sis and not automatically outside each property.
- A review of current town centre parking, and development of a strategy which will limit access by private car while facilitating more public transport, walking and cycling within Wiltshire’s town. This review is referred to in Appendix C of the Transport Review: it is a recommendation dating from 2018 and clearly needs to be undertaken ahead of any Local Plan Review. As well as encouraging modal shift this could free up town centre car park sites for more appropriate development.
- Bus stops must be more convenient and more accommodating than currently the case
- All new developments would have secure bicycle storage, walking and cycling links should be a connected network with access to local amenities and town centres.
- Public and active transport needs to be expanded to include the growing area of e-bike hire and car share clubs.
- Local amenities within a short walk or cycle ride of all new developments.
- Provision for home working and town centre co-working spaces.
- EV charging infrastructure in all new developments

- Low emission zones and Clean Air Zones

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?

Covered by others such as Wiltshire Climate Change Action Group, who are much more experienced in these matters.

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?

Covered by others such as Wiltshire Climate Change Action Group. Who have commented widely on this area.

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

Rep ID: Climate106

Consultee code: General Public

Consultee Organisation (if applicable): Corsham Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

It is around two years since Wiltshire Council boldly chose to accept the climate emergency and to aim for carbon neutrality for the county by 2030. However difficult this aim, this democratic mandate should be kept at the forefront of policy decisions. I would like to offer my comments to this process and am speaking as a Corsham resident. The Town Council, of which I am a member, will be adding its own collective views.

As the Local Plan consultation's published SCATTER data states, buildings and travel to account for 93% of Wiltshire's greenhouse gas emissions, it is imperative that those who build and operate buildings, who choose locations for housing and business, and those who design the transport network, have clear rules about how their activities help to meet these carbon-neutral goals.

As it stands, the proposed Local Plan seems to offer, at best, a wish-list of environmental measures, subservient to the on-going demand for homes and smooth traffic flow. This is at odds with the Council's stated aims and undermines its ability to achieve them.

As the county's planning officers will doubtless confirm, and as we in Corsham have discovered in the last few years, any loopholes in the Local Plan will be abused. This is totally understandable. Why would a business choose to limit its profitability if there is no imperative so to do? But the future cost of carbon reduction on finished homes is far more complex and expensive than doing it during the build. If Wiltshire can meet its promise to make its council housing carbon-neutral, why not all developers?

Therefore, it is vital that the Local Plan for Wiltshire is rock solid on the subject of biodiversity and climate change. Many good suggestions are listed in the relevant chapter of the draft plan, but that is all they are, suggestions and mild criticism. The Spatial Strategy and Local Transport Plan fail to meet these suggestions with any firm targets or means of enforcing them. This offers not just loopholes, but gaping breaches for developers, planners and businesses to charge through.

As the consultation itself says:

3.2 Planning for a future within a changing climate requires greater emphasis to be applied to place making and the achievement of sustainable communities. The NPPF states that 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.'

3.3 The Town and Country Planning Association and Royal Town Planning Institute state 'Plan-making and development management can fully support the transition to a low-carbon future in a changing climate. Overarching climate change objectives in local planning empower local communities to:

- Shape places to help secure radical cuts in greenhouse gas emissions (for example through efficient building design and changes to the way we travel).
- Actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure.
- Shape places and secure new development to minimise vulnerability and provide resilience to impacts arising from climate change, in ways consistent with cutting greenhouse gas emissions (this includes adapting to impacts such as flooding and warmer temperatures).

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

So, surely the Wiltshire Local Plan needs to show some teeth if the Council is going to keep its promise:

1. All new-build homes from the date of the publication of the plan must be carbon-neutral, including the building process, the new road network and landscaping.
2. All homes should be capable of generating much of their own energy from solar roofs to heat pumps and be equipped with superfast wi-fi and car charging points.
3. Siting of new homes should reduce motorised commuting, including proximity to local businesses, shops and schools, cycle routes, footpaths and near public transport stops.
4. Development should minimise use of greenfield sites, avoid flood plains, carbon sink land, and show relevance to the growth of established communities, rather than sprawling away from centres.
5. Development sites need to be balanced with matching rewilding and afforestation in the local area.
6. Roadbuilding should be based on current information rather than outdated statistics. The emphasis should be on re-opening the rail network rather than adding more miles of tarmac.
7. All new business developments should be carbon-neutral or negative, include charging points for electric cars, cycle provisions, including secure covered cycle parking and priority given to pedestrians and public transport.
8. The Local Plan should directly promote renewable energy production, including agreeing sites for on-shore wind turbines, battery storage systems (as they come online), hydro-power, incentives for domestic and business solar generation, and disincentives for fossil fuel based generation systems.
9. Base the total house-building programme on up-to-date projections of need and ensure the types of housing are categorised by the same means, restricting excessive builds that will swamp established communities and that affordable homes are prioritised over 'executive' ones. The current plan exceeds need to 2036 by around 5000. Why?

Regardless of forthcoming changes in national planning law, Wiltshire Council has the legal power, and has expressed the will to ensure that its people, particularly its children, have a safe place to raise families in quality homes at affordable prices, close to good jobs.

So, please live up to the promise of the climate emergency vote and do not bow to pressure from those who seek to profit from maintaining the unacceptable status quo. Please replace words like 'hope', 'aim', 'try' and 'use best endeavours' with more certainty, decisiveness and fixed, measured goals. Let's stop kicking the can down the road because the road is running out.

Rep ID: Climate107	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): WaddetonPark Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate107
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?	
<p>The national legislative and policy context in regard to climate change is going through a rapid change at the current time – with legislation anticipated on Future Homes, biodiversity net gain, energy provision, and electric vehicular charging within the coming months. Given the timelines anticipated with the LPR, it is likely that these will have taken place, or progressed significantly by the point at which the LPR is submitted to Examination. It is therefore going to be necessary for the LPR to be responsive to these.</p> <p>By far the most significant opportunity to address climate change is through the spatial strategy with the delivery of a sustainable pattern of development (paragraph 11, NPPF). This is emphasised by the analysis provided within the supporting Paper which indicates 40% of Wiltshire’s Emissions pertain to transport (p9).</p>	

We have commented elsewhere within this consultation, that there is a lack of evidence supporting the Preferred Strategy. The size of an existing settlement is not a sufficient justification that further development represents the most appropriate sustainable pattern of development.

The consultation document references the emerging Local Transport Strategy – this must form part of the evidence base supporting the emerging LPR, and should be published as part of the consultation. The Local Transport Strategy should be undertaken in two parts – first, a comprehensive baseline providing an opportunity to test various patterns of development based upon the existing network (and potential interventions), and then the final Local Transport Strategy based upon the emerging Spatial Strategy.

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

A3: How should these actions be delivered and measured?

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

We agree with the measures set out in the consultation document. We note that this must accord with national flood risk policy – and as such, the reference that no built development should take place outside out Flood Zone 1 should be updated to reflect that the NPPF explicitly identifies the suitability of development based upon its level of vulnerability – and that development can take place within flood zones subject to the sequential and exception test.

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?

We support the aspirations set out in the consultation document – and recognise the multi-faceted benefits of enhancing existing, and delivering new Green and Blue Infrastructure. The document references an emerging Green and Blue Infrastructure Strategy; and this appears to form the basis of the maps included within the settlement specific topic papers, however, the document itself must be published as part of the evidence base supporting the LPR.

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?

Following the drafting of the consultation document, the Government have published its response to the consultation on the Future Homes Standard – with this confirming a two-stage approach to reach ‘carbon ready homes’ by 2025. The first stage in reaching this target has recently been published with draft Building Regulation changes at consultation. The decision to take a two-stage approach, with zero carbon ready homes (a 75% reduction in carbon emissions) from 2025 is based upon the need to develop supply chains, skills and construction practices. In bringing forward local policies which differ from national standards, or are implemented earlier, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of delivering these policy requirements.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

The delivery of decarbonised energy is intrinsically linked to the Future Homes Standard, and is also subject to separate legislative changes, for example the forthcoming gas boiler ban. It will be necessary to consider these in drafting the local policies.

The range of decarbonised energy production technologies available for new developments is wide, and constantly evolving. The most appropriate technology for any individual development will vary; for example, depending on the site specific characteristics, and the nature, scale and design of the development. We therefore suggest that the policy is flexible, and doesn't set a particular preference in regard to which technologies are used.

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

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?

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?

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?

We set out above our comments on the principle of development, sustainable pattern of development.
The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that the policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.
We support the intention of the Council to engage now with the network operators, and this will need to conform part of the Infrastructure Delivery Plan (IDP) supporting the LPR.

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?

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?

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?

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

Rep ID: Climate108

Consultee code: Other

Consultee Organisation (if applicable): SWLEP

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate108

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

We recognise the measures proposed to reduce the carbon footprint of the county and we agree with them as established tools to do so, but we question whether the measures are radical enough to meet Wiltshire Council's 2030 net zero aspiration in response to the climate change emergency.

The LIS clearly highlights the importance we have placed on the opportunities to generate hydrogen energy and support the uptake in new energy vehicles, both domestic and public transport. Work is in progress to build the feasibility cases for investment on a pilot basis. We would welcome further information on how Wiltshire proposes to support the likes of hydrogen energy generation and electric vehicle and hydrogen energy charging points. SWLEP would be open to discussing options for joint feasibility work and scheme delivery subject to funding availability.

In addition, SWLEP is co-funding a PhD research student to understand the value of Natural Capital, that is ascribing an economic value to natural assets, in order to understand how to embed it within our decision making. We note the policy for new developments to result in a 10% biodiversity net gain which needs to be actively managed for 30 years in order to enhance Natural Capital. We are not yet in a position to comment on whether this will be sufficient response.

We also note that consideration of wind power is cited within the Spatial Strategy proposal. SWLEP is in support of a range of renewable energy solutions being progressed, however we recall that wind power turbines were strongly opposed by local MPs and communities in the past. Progressing less visually imposing solutions may therefore have greater support and a quicker turnaround in terms of delivery.

The LIS also highlights the issues in terms of energy, water and sewerage constraints which can restrict commercial and domestic developments; an issue not uncommon across neighbouring geographies too. Mechanisms for collective cross border negotiation with DNO/DSOs is recommended.

In terms of flood risk mitigation and management, has the option not to build in flood risk areas been considered?

As mentioned above, we are supportive of the use of new energy vehicles for commercial and domestic use aligned to a low or zero carbon energy generation source. In terms of public transport, are proposals in place to understand how this can be proactively delivered with local authority involvement or will it all be delivered by the private sector?

Rep ID: Climate109	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Robert Hitchins Ltd	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>In addressing climate change the plan needs to reflect the NPPF Chapter 14 and the PPG Climate Change. In summary paragraph 148 of the NPPF states how the planning system should address climate change.</p> <p>“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”</p> <p>The PPG provides the advice how climate change can be addressed through the local Plan Paragraph: 003 Reference ID: 6-003-20140612 Revision date: 12 06 2014. The paragraph provides examples of mitigating climate change by reducing emissions and examples of adapting to climate change.</p>	

Land use policies should be evidence based, realistic, viable and achievable. A sustainable pattern of development and an appropriate distribution of growth are important means to help address climate change, however there are limitations on the ability of land-use planning policies to addressing climate change.

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

Whilst the emerging strategy needs to reflect the three overarching objectives of the NPPF it also needs to be cognisant of what is achievable, for example is striving towards the objective of Wiltshire being a carbon neutral authority by 2030 , policies have to be capable of being implemented, being deliverable and the not undermining the viability of proposed development. In other words aspirations need to be realistic and set within the framework of government policy/guidance. A distribution of new development that delivers greater levels of self-containment and reductions in unsustainable travel patterns is a practical and achievable step towards reduce carbon emissions.

A3: How should these actions be delivered and measured?

All policies in the Plan should be capable of being monitored and thereby actions will be assessed and measured.

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

It is agreed that wherever practicable, it is important to incorporate Sustainable Drainage Schemes (SuDS) within planned development schemes.

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?

Under Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and Biodiversity, the Council proposes that all new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy.

The Council's policy approach to biodiversity should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap. The mandatory requirement provides a level playing field nationally and reduced risks of unexpected costs and delays.

The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill. The Government proposes to work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, in order to provide clear and timely guidance on understanding what will be required and when.

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?

Under Policy Theme 3 – Sustainable Design and Construction in the Built Environment, the Council is seeking to achieve net carbon neutrality by 2030. All new development should be designed to achieve net zero carbon standards.

It is important the plan is prepared so that it is consistent with government policy the Council's proposed policy approach should not conflict or go beyond the Government's proposals for Building Regulations. As set out in The Future Homes Standard consultation (ended on 7th February 2020), the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.

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?

It is not possible to achieve zero carbon from the anticipated date of adoption of the Local Plan in 2023.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

The Council's approach to the delivery of zero carbon new development will affect scheme viability.

The PPG states that:

"...policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land." Paragraph: 001 Reference ID: 10-001-20190509 Revision date: 09 05 2019
The key issues is that policies are realistic and the total cumulative cost of all relevant policies should not undermine the delivery of the plan.

In plan-making, viability is inseparable from the deliverability of development. As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the LPR (para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the LPR is threatened (para 34). The viability of individual developments and plan policies should be tested at the plan making stage.

It follows that the Council's policy approach to zero carbon development should not compromise deliverability and viability.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should rely on proposed changes to the Building Regulations. The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council is referred to the Government's proposed changes to Parts L

(Conservation of Fuel & Power), F (Ventilation), M (Access to & Use of Buildings), R (Physical Infrastructure for High-Speed Electronic Communications Networks) & S (Electric Vehicle Charging in Residential & Non-residential Buildings) of the Building Regulations and the Government's proposals for biodiversity gain set out in the Environment Bill.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

No comment.

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?

No comment.

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

No comment.

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?

No comment.

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?

No comment.

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?

No comment.

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?

The Council's approach should be aligned with the national agenda.

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?

No comment.

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?

No further comments – see response to question B5

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

Rep ID: Climate110	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Carbon emission trends can only be significantly reduced if other steps are taken as well, to inform people of the changes that are necessary and to make these happen. However the local plan must play its part by ensuring that all new developments achieve net zero carbon standards and that transport impacts are minimised.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Wiltshire Council should refer to the RTPI's recent paper Net Zero Transport: the role of spatial planning and place-based solutions <https://www.rtpi.org.uk/research/2020/june/net-zero-transport-the-role-of-spatial-planning-and-place-based-solutions/> Steps which need to be considered include:

- Prioritise urban renewal while achieving a substantial reduction in travel demand: there should be a strong presumption in favour of developing brown field sites rather than developing green field urban extensions.
- Support local services and amenities, also public spaces and 'green links' which will encourage active travel such as walking and cycling.
- Local hubs for start-up businesses and to provide space for working and meeting.
- Make provision for home working, by ensuring houses are designed with office/study space, and by prioritising high speed broadband connectivity.
- Alter travel patterns so that there is an incentive to adopt active travel modes, and to use public and shared forms of transport.

Wiltshire Council needs to adopt an integrated approach with ambitious targets for trip reduction, modal shift and carbon reduction.

A3: How should these actions be delivered and measured?

Appropriate policies need to be written and then monitored. The summary in Appendix 1 of the Climate Change document shows a consistent lack of monitoring of the current plan policies since adoption.

This is particularly disappointing when the Inspector into the current Core Strategy placed particular emphasis on monitoring "To be sound, the CS must be effective. The effectiveness of any plan is partly dependent upon the means by which its implementation is managed. The effective use of monitoring against suitable benchmarks is a key means by which the success of a plan may be gauged. I view such matters of particular importance." (Planning Inspectorate, Report on the Examination into the Wiltshire Core Strategy, Andrew J Seaman, 1st December 2014, para 421).

A number of national targets have been proposed: these should be carried forward at a local level as well. E.g.

- The 6th Carbon Budget required under the Climate Change Act suggests (Dec 2020) that there needs to be a reduction in car mileage of 1-4% by 2030, and between 4% and 12% by 2050.
- The Government first Cycling and Walking Investment Strategy (CWIS) published in 2017 set the following aims and targets to 2025:

- to double cycling, where cycling activity is measured as the estimated total number of cycle stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025, and to work towards developing the evidence base over the next year
- to increase walking activity, where walking activity is measured as the total number of walking stages per person per year, to 300 stages per person per year in 2025, and to work towards developing the evidence base over the next year
- to increase the percentage of children aged 5 to 10 that usually walk to school from 49% in 2014 to 55% in 2025
- Additional metrics are suggested by the House of Commons Science and Technology Committee which reporting into “Clean Growth: Technologies for meeting the UK’s emissions reduction targets” [HC 1454] (August 2019), which concludes that “...In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. The Government should not aim to achieve emissions reductions simply by replacing existing vehicles with lower-emission versions. Alongside the Government’s existing targets and policies, it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim to reduce the number of vehicles required, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and supporting increased levels of walking and cycling. The Government should commit to ensuring that the annual increase in fuel duty should never be lower than the average increase in rail or bus fares.” (Paragraph 131)

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

It is debateable whether 'existing policies and strategies are effectively monitoring, managing and improving air quality'. The number of AQMAs has increased across Wiltshire since the County went to unitary in 2009 and in Salisbury the area covered by AQMAs has been enlarged

•Additional measures are needed: for a revised approach see "Net Zero Transport: The role of spatial planning and place-based solutions" [RTPI Jan 2021] [<https://www.rtpi.org.uk/netzerotransport>]

- In addition to ‘public and active transport’ there needs to be consideration of shared transport solutions, or ‘Mobility as a service’ [MaaS]. This should include Car share clubs (e.g. Co-Cars in Salisbury), and how they can be incorporated into developments, also demand responsive public transport.
- Current edge of town car-based developments will have unacceptable consequences in terms of pollution and congestion. It also makes no sense in terms of land use planning to allocate space for cars which are typically parked 97% of the time. A change in parking policy will be necessary – as a minimum an approach to allocate less parking in town centres and to permit car-free developments in appropriate locations. See for example the SPD adopted by Bournemouth & Poole <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/Planning-Guidance/BCP-Parking-Standards-Supplementary-Planning-Document.aspx>

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?

Any reference to ‘public and active transport’ should be expanded to “public, active and share transport”. This would include such things as Car Share Clubs, e-bike hire and the like. Elsewhere local authorities have produced specific guidance on how Car Clubs can be funded through new developments.

The shift to public transport and active travel could be encouraged by

- Restrictions on parking spaces – making residents pay for parking spaces, and having these further from housing than shared transport (e.g. car share club vehicle) or public transport will help.
- Investment in demand responsive public transport
- Investment in rail rather than roads. In Salisbury consideration should be given to potential new stations at Wilton and Porton.
- Delivering safe cycle links – e.g. Wilton to Salisbury, Salisbury to Porton, Salisbury to Alderbury
- Car ownership should be discouraged through the design of the public realm and the ‘decoupling’ of private parking from new homes sales. Parking spaces for private vehicles in new development could be made available on a leasehold basis, located at least 5 mins walk from most dwellings. Parking for car share vehicles, and stops for public transport, should be more conveniently located than parking for privately owned vehicles.
- A review of current town centre parking, and development of a strategy which will limit access by private car while facilitating more public transport, walking and cycling within Wiltshire’s town. Such a review is referred to in Appendix C of the Transport Review: this recommendation dates from 2018 and is needed ahead of any Local Plan Review. As well as encouraging modal

shift this could free up town centre car park sites for more appropriate development for residential use, as community hubs and green spaces.

- All houses would have secure bicycle storage, and walking and cycling links would join to a connected network allowing access to local amenities, neighbouring communities, educational establishments and town centres.
- Local amenities should be located within a short walk or cycle ride, creating the '15-minute neighbourhood'.
- EV charging infrastructure in all new developments
- Low emission zones and Clean Air Zones

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?

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?

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

p. 9 Typo - On-road Wilts Transport Emissions should read 78% not 3%

Rep ID: Climate111

Consultee code: Other Advisory Bodies

Consultee Organisation (if applicable): Wiltshire Wildlife Trust

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Sadly, we feel that the paper fails to address the ecological crisis and threats to biodiversity.

The objective to protect and create Green Infrastructure (GI) exists in Core Policy 52 and we recognise that the Council's emerging GBI Strategy will discuss this in more detail. However, this paper for the Local Plan should do more than simply signpost to this emerging strategy. It is very disappointing to see that this paper largely excludes discussion of the ecological crisis. The title of the paper suggests an equal consideration of climate change and biodiversity. Such an approach we welcome – the climate and ecological crises are inextricably linked. Indeed there can be no solution to the climate emergency without tackling the ecological crisis. A search of the 81 page paper for terms relating to biodiversity and ecology quickly shows how unbalanced this document is.

The recognition of climate change and the challenges it poses are welcome. However, the strong focus on carbon, the climate emergency and the term “biodiversity net gain” sets the wrong tone and prevents thorough examination of viable solutions to the ecological crisis. Climate change mitigation and biodiversity net gain are only two of many possible delivery mechanisms. There should be a much more holistic approach to exploring Nature Based Solutions; these will not only help the county respond to climate change but will also support nature's recovery within Wiltshire.

Future land-use plans must discuss their role in tackling the ecological crisis and nature's recovery as well as climate change. The plans and policies must be more ambitious, expand their scope and go further than simply mention “Protecting the natural environment...” (section 3.7). This paper should really set the scene for the interconnected landscape approach of the Nature Recovery Strategies that have emerged in the Environment Bill, and build a policy framework within which to coordinate viable and meaningful conservation efforts to address the ecological crisis.

Including the discussion of biodiversity and the ecological crisis within the context of Green Infrastructure fails to recognise the scale of the issue. Biodiversity net gain and the provision of ‘wilder’ green spaces within the built environment will provide a crucial link for wildlife to live in and move across our landscape and these measures will be an important part of the emerging Nature Recovery Network. However, to truly reverse the ecological crisis and tackle climate change, biodiversity and the natural environment must not be considered as a sub-element of a policy theme. These issues cannot be addressed in a piecemeal manner. In addition to the landscape scale concept of a nature recovery network, to truly deliver gains for biodiversity there must also be more detailed consideration of other important aspects, for example quiet spaces and refuge areas for wildlife, where disturbance from public access is reduced and the more sensitive species and habitats can thrive.

We would like to see the title of the paper 'Addressing Climate Change and Biodiversity Net Gain' changed, with the removal of the term “Biodiversity Net Gain”. If this is to be a combined strategy, the focus should reflect this fully and the title and content of the paper should focus on “Natures Recovery”.

It is not sufficient to leave detailed discussion of biodiversity to the GBI Strategy. There should be an additional policy theme of Natures Recovery outlining the range of mechanisms, which include biodiversity net gain and climate change mitigation, which can be used to tackle the ecological crisis.

Rep ID: Climate112	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): South Western Railway
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes, particularly in the transport sector. The Local Plan cannot address all the existing issues but equally the wrong decisions can set in train significant problems in carbon emissions in the future. For example locating development to justify and help fund strategic road improvements is self-defeating from a carbon point of view. On the face it it may deal with some short term issues but in the medium and long term scenarios it will encourage additional car trips and unsustainable travel patterns.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
This can be delivered through:	

- Locating development on existing good transport corridors;
- Designing new developments well to make walking and cycling and bus travel high quality, not just adequate, including the design of houses / flats themselves and the routes through, to and from developments;
- Developer contributions being prioritised towards walking, cycling, bus and improvements to rail stations as well as access to them
- Ensuring electric vehicle charging points and the required grid infrastructure are planned for and developer funding secured
- Shared mobility hub sites in new development sites are planned for and developer funding prioritised – these are critical to making public transport, especially rail, a practical and attractive option
- Clear alignment between local plan allocations and rail infrastructure strategies, especially at the Sub National Transport Body level. This will help ensure that the required rail investment can be justified, but not if the main emphasis is on road improvements.

A3: How should these actions be delivered and measured?

. This can be delivered through:

- Locating development on existing good transport corridors;
- Designing new developments well to make walking and cycling and bus travel high quality, not just adequate, including the design of houses / flats themselves and the routes through, to and from developments;
- Developer contributions being prioritised towards walking, cycling, bus and improvements to rail stations as well as access to them

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

No – transport is not dealt with effectively. There needs to be a much better understanding of the origins and destinations of trips created by new development followed by an analysis of intervention options of how to minimise private travel by car, particularly for trips beyond a few miles. This is important to them frame how developer contributions are prioritised. At the moment there appears to be an automatic assumption that the priority is investment in road improvements, ignoring the option of rail investment (both in infrastructure and service kick start provision) which would also help reduce some of the existing trips on the road network.

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?

Removing the automatic assumption that new development should contribute to road improvements and not rail. There needs to be a clear link between spatial strategy and the Western Gateway rail strategy and strategic transport plan which is missing at the moment.

A clear framework to ensure both developer funding and land allocations / plan policies enable the provision of shared transport via mobility hubs (including buses, e-bikes, car club vehicles etc.) and clearly embedded in the policies for large new development sites. Shared transport such as a well-planned network of car club vehicles is vital to supporting the wider public transport network and helping to ensure that the need for multiple car ownership in new households is minimised.

There needs to be a recognition of the critical importance of first mile / last mile connections to / from rail stations to make the network accessible. Developer contributions should be prioritised for investment in walking and cycling routes between developments and rail stations with minimal investment in roads. Otherwise the current pattern of unsustainable development witnessed in recent years will just be perpetuated.

Policies should facilitate the agglomeration of developer contributions through CIL or S106 to provide facility improvements at rail stations such as expanded car parks, mobility hubs and access for all schemes (including lifts).

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?

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?

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

Rep ID: Climate113	
Consultee code: General Public	Consultee Organisation (if applicable): Wiltshire Council - Councillor
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No, not unless the government changes building regulations, but if you can achieve the installation of PV panels, EV charging points , grey rainwater collection, heat exchangers (as noiseless as possible if buildings are positioned close together) and provide good and easy access for walking and cycling to shops, schools etc, then it is a start.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Green infrastructure, employment zones in walking and cycling distance of residential development, appropriate tree and flora planting schemes (with reduced maintenance needs), walking and cycling routes away from roads.	

A3: How should these actions be delivered and measured?

Mostly by developers

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

SUDs schemes can be very attractively designed within park areas. Who will pay for retrofitting SUDs in existing developments? I don't think we have much influence over arable farming methods

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?

How will the 10% net diversity gain be measured? I think it should be included on-site by developers

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?

It is a balancing act re viability and not wanting to see the loss of affordable housing.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Presumably, only developers can answer this.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Depends what is meant by support. If financial, only if we obtain government funding to support this

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?

Large areas of the county have no access to gas and are reliant on oil-fired central heating. If we move everyone over to electric heating etc, we will become in danger of not generating sufficient power. These changes need to be made in hand with increased electricity generation, preferably reliable energy sources, e.g nuclear.

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

We should NOT be encouraging wind turbines in Wiltshire. We have a very large area of the county that is AONB where we are required to conserve and enhance the landscape, not ruin it with large turbines. It is mostly those areas that are the windiest, although the county is not especially windy. I would not support vast swathes of solar farms being permitted in AONBs either.

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?

No.

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?

As technology improves, solar pv panels may become more discreet and should become permissible in CAs, AONBs, and on listed buildings. If they are not visible there is more of an argument to accept them in these areas.

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?

Most air quality issues arise from traffic emissions. As we move to more electric vehicles and low emission vehicles, this should solve itself.

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?

Supply of separate walking and cycling routes, not necessarily adjacent to roads, but leading to shops, employment etc. Provide ebike schemes so that residents can experiment with different modes of transport without having the capital outlay. It will be a hard sell to encourage drivers from their cars.

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?

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?

Developers can only answer this. We need the affordable housing too.

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

Rep ID: Climate114	
Consultee code: Other	Consultee Organisation (if applicable): Transition Community Corsham (Transcoco)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
I do not feel that the Local Plan in its current form can deliver the outcomes needed to reverse existing carbon emission trends before 2030. The language of the report is too vague, not robust enough and does not have specific targets.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
The Local Plan should have very specific, measurable targets to reduce carbon emissions. A year has passed since Wiltshire first voted to declare a Climate Emergency. I cannot understand why the current Local Plan is still tentatively discussing how to set a Carbon baseline for Wiltshire instead of stating specific targets in each area to address reducing the carbon footprint for Wiltshire.	

These would include:

Seeing all new developments of housing, transport, business development and infrastructure through the lens of the climate emergency.

Making all new developments, and planning for infrastructure to be carbon neutral and to ensure there is 'net gain' for tree planting, soil health, biodiversity and blue and green schemes across Wiltshire.

A3: How should these actions be delivered and measured?

There are many schemes already adopted by other authorities as cited in the Local Plan. Wiltshire's Local Plan as it stands merely cites these schemes, but is not specific which it will adopt, implement and measure success against. How many trees will Wiltshire plant to come in line with even the UK national target of 17% tree cover? Currently Wiltshire has only 9% tree cover.

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

I am not an expert in flood risk. All I can see in the plan at the moment are very vague suggestions for tackling flood risk and promoting sustainable water management. The language used in this section is what may be possible, what objections on design grounds are possible and that more could be done.... I do not see any specific proposals at all apart from adopting the greenfield run off rate and 20% betterment.

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?

No. This plan is again not specific enough, nor does it state the positive actions that need to be taken. Just saying the development 'should be ambitious' says absolutely nothing about what the ambition is. The net gain of 10% on all new

development does not specify how this will be implemented or incorporated into existing planning, nor does it have a timescale for implementation.

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?

Again, the language is about 'should be' not 'will be'. How can you possibly successfully plan for a net carbon future when you only say 'should'? Surely all targets need to be stated as actions which are timed, measurable and have detailed action plans for implementation. I was an [TEXT REDACTED]. If a school gave me a plan for development for scrutiny as vague as this, I would have been considering the school as a failing school.

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?

The move to all new development being rated as zero carbon is achievable if there is the will and the resources given to it. This local plan does not fill me with the confidence that Wiltshire Council has the will to implement the challenging and often uncomfortable actions that are necessary to achieve zero carbon on all new developments. This current pandemic has shown us that vaccinating an entire population in a few months is possible. The climate emergency is as real as the Covid 19 emergency. Wiltshire can achieve this target, but only with more specific commitments.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It is no longer realistic to consider this question. If we do not reduce carbon, there may not be an earth to receive any further planning or developments. The rising sea temperatures, the rising climate catastrophes may have decimated us all. We have to take action now. So scheme viability is the wrong question to be asking.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Wiltshire should be bold in the ways in which it wants to achieve its goals.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It has to be built into Wiltshire's plans and to be properly funded. There are ways of retrofitting which are well known. If Wiltshire had not allowed developments of houses to low carbon standards to be built, they would be in a better position now on retrofitting. There should be financial incentives for house owners to carry out the retrofits and even legislation passed to ensure all homes are brought up to standards to lower their carbon emissions. Wiltshire should engage local communities and take a communications stance, which states more powerfully, the challenges facing Wiltshire, the UK and the world. Climate Change is not just a Corsham problem, a Wiltshire problem or a UK problem. It is a world problem. Wiltshire can be much more proactive in stating facts about the climate emergency, which would encourage all households to take action, including retrofitting their houses, being given information on things to do to change their carbon emissions.

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?

No. The language is again, 'where practicable and achievable'..... How is this an action plan to make headway in decarbonising energy production. Plans for storage of electricity must be incorporated, not 'should be' The plans should again be specific, measurable and time scaled. This section has no targets like this. Wiltshire Council should review its planning for wind turbines for example. The target could specifically say the percentage of solar panels to be incorporated across Wiltshire, both on individual buildings and in stand alone solar farms. W. C. could also plan for the number and capacity of wind turbines across Wiltshire.

W.C. could state how many battery storage sites it would seek to make.
W.C. could state the percentage of retrofits it plans to do each year until 2030.
W.C. could state the amount of energy it would seek to generate from waste and biomass projects.
W.C. could state the amount of energy it would seek to generate from new developments of housing and infrastructure eg by incorporating solar roof systems on new builds.
The current plan is again not specific, time measureable, carbon measureable, or broken down into achievable goals.

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

W.C. should embrace all technologies, including wind turbines. One type of sustainable energy is not as robust as a mix of all : solar, wind, biomass. The plan should include energy technologies across the spectrum and across all sectors of the authority, public, private, commercial and individual.

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?

Yes. The plan must set targets for the production and use of renewable energy. If it does not, then how can this form part of an actionable plan. There are experts within Wiltshire, within Corsham eg [Name redacted] in Corsham, also part of Transcoco has advised government on carbon reduction. To be still asking this question now at the eleventh hour and a year after the Climate Emergency was declared in Wiltshire is to be seriously missing the point. Please yes, incorporate specific targets. They can be measured easily in terms of output.

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?

If we do not incorporate technology into sensitive sites, there may be no sensitive sites in the near future to retrofit. This Climate Emergency is real. It is imminent. There are very many creative solutions to carbon reduction. I personally think wind turbines are beautiful. Small wind turbines near sensitive sites can be very pleasing, can generate green electricity and be visually pleasing and innovative.

The National Trust has been using solar slates on its buildings for years. Most people cannot tell the difference between solar slates and the real thing. Lets use more integrated solar slate roofs. If existing buidlings change from gas to electricity and the electricity they use is sustainably produced, then this goes a long way to being carbon neutral. Use carbon offsets as well eg tree planting over and above the required amount to sequester carbon, where retrofit is not appropriate.

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?

No they need to be more specific. Just saying will likely need to be, does not cut the mustard. There is heaps of guidance on this. Wiltshire Council has access to all this guidance. I am not an expert, but these stated targets are not SMART.

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?

The Local Plan should state specific targets for new developments eg

Number of charging points to be incorporated

Number of cycle route miles to be incorporated

Number of walking paths to be made

The plan should specify the need for the 15 minute rule ie that all households should be able to walk/cycle within 15 minutes to get the basic amenities they need.

New developments should incorporate wifi for home working, small businesses for working close to home, so that journeys for work can be less.

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?

This is not a viable statement. Ways of making the charging infrastructure work are already available. W.C. has the power to make it work.

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?

It will be amazing. There are so many examples of existing zero carbon living schemes across Europe and Britain which Wiltshire Council can look at. Greening Wiltshire with more tree planting, developing open spaces within new developments, cycle paths, walking paths and charging points, wind turbines, biodiverse open spaces would all be wonderful and enhance Wiltshire.

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

Please re write this plan with SMART targets that are achievable, actionable and communicated well to Wiltshire residents so they see the need for implementing them and the consequences if they don't. If we do not take this once in a lifetime opportunity to really do something to reduce our carbon footprint in Wiltshire, there may not be a Wiltshire to plan for at all. Please take action now to address the Climate Emergency as you pledged a year ago.

Rep ID: Climate115	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>I suspect not:</p> <p>a. In Wilts the natural/semi natural land is at near C equilibrium.</p> <p>b. Restoration of shallow freely draining agricultural soils on chalk have a C capacity at lowest end of spectrum for sequestration. Scope for creation of wetlands and expansion of woodlands are either limited or very slow to sequester the required tonnages to influence net emissions within the required time frame.</p> <p>c. If Urban/Built environment and infrastructure increases will include 50K new homes at 50t CO₂e (2.5MtCO₂)+ A350 'Improvements' £135M at 456 tCO₂e per £1 million (65,000t) + A303 Stonehenge (+1.95 MtCO₂) add some 4.5Million Tonnes of CO₂e emission in just their embodied carbone . https://tps.org.uk/news/the-carbon-impact-of-the-national-roads-programme New build operating emissions, increased fuel consumption from additional housing, increased transport pre-electrification, etc. (Unless widespread permanent adoption of home working.), a population that favours larger/SUV vehicles, etc. that exceed</p>	

efficiency saving, will all combine to further increase emissions long after 2030 ban on only fossil fuel new domestic vehicles (Hybrids and diesel HGVs will still be sold),
Currently there is no evidence that the increased demand for electricity for EV or H2 transport will then be met without additional LNG electricity generation. If Wilts “Consumption” not “territorial” emissions are to be the basis for baselining Carbon neutrality then it seems impossible to achieve neutrality by 2040 let alone 30... but try!

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

All construction domestic and commercial required to maximise energy generation and efficiency.
Discourage local car ownership and use by investing in improved frequency of EV public transport, improved safe cycle routes, adoption of “people friendly streets” in urban centres, provision of bikes for hire at stations & park and rides. Provision of additional charging outlets. Encourage Community energy schemes in and large scale Solar PV and Wind generation near urban centres. Encourage the development and deployment of grid scale electricity storage sites near generators and Nat Grid transformers.

A3: How should these actions be delivered and measured?

Require all renovations, refurbishments and new build projects across the county to demonstrate Solar PV and thermal arrays, air (Ground if new build) source heat pumps and high insulation standards are integral to plans demonstrating C neutral whole life operation. Performance against plan assessed annually and developers to pay for retrofitting to meet standards like any other construction fault.
Reduce business rates if able to contribute to GHG reductions (Or surcharges for those that do not.). Ensure contributions to Carbon Neutrality cannot be trumped by aesthetic objections based on Heritage, appearance, etc.,

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

The measures address the built environment and the natural flood management strategies needed to prevent or mitigate flood events once surface run off or groundwaters enter water courses. The area not addressed adequately is agricultural silt, chemical and effluent surface run off, plus the apparently permissible discharges from inadequately engineered human and effluent storage which overflow or discharge under flood current high rainfalls.

<https://www.arcgis.com/apps/webappviewer/index.html?id=a6dd42e3bc264fc28134c64c00db4a5b&extent=-401307.0872%2C6628364.5565%2C-130261.3849%2C6788576.5678%2C102100>

Fields liable to surface erosion, usually arable or free range pigs, are obvious where run off courses along roads. The clay minerals clog chalk stream gravels and the accompanying N, P and K atrophies water causing invertebrate and fish deaths, the chemicals residues have unknown results. Sediment traps, bunds and improved agricultural practices prevent such damage, Likewise upgrading waste storage and management to meet actual flood levels/events. Spillage, overflows and surface run off should be prosecuted by the Council or EA by default.

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?

Excellent but appears to be limited to new developments? I suspect these represent a very low % of the total built estate so additional so a net gain of 10%+ on a very low % is valuable but small. If so need to start addressing the low or negative natural capital held by past poor quality developments. Perhaps this could be addressed on any change of ownership of land or property with values reduced by the cost of restoration to a minimum acceptable level, with costs falling to whoever carries out the work.

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?

Probably not in scope but all the measures described should ALREADY be in force and so no new works should be permitted to proceed without full compliance to these standards. I can think of no rational explanation for not already applying these standards to all new builds and renovations. As the likely hood of either electricity (Not generated by CCGTs) or H2 (Not produced from methane) replacing Natural gas in urban sites, LPG and Oil across the rural estate for heat and power before the next decade increasing the efficiency/reducing energy waste from the existing built stock will be the only means of significantly reducing GHG emissions at scale. Therefore by 2023 plan measures should be taken to require the far more complicated and potentially expensive task of retrofitting properties that are not otherwise scheduled for any renovation or refurbishments. Perhaps any transfer of ownership should require such retrofitting to minimise properties' carbon footprint which perhaps should be deductible from property sale values.

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?

Yes and not wait till 2023 but from now.

It should be achieved in exactly the same way as the aerospace industry carries out critical systems upgrades and retrofits to airframes: As soon as a critical design fault is identified the entire fleet is grounded and does not take off until retrofitted (Usually, for the 737 Max it took two) - that x thousand people are still living in demonstrably flammable death traps years after Grenville, Dubai, etc, suggests that lives lost 'elsewhere' don't matter or the action required is in the all too difficult category. CV-19 demonstrates that when there is the political will and leadership, uncomfortable and costly action can be taken to save other people's lives. If it is not achieved it is simply because people able to exert sufficient influence to delay the measures, intentionally or unconsciously, are doing so for personal or corporate financial gain that they calculate exceeds the value of the consequential additional general climate damage and the cost to future owners and occupiers who will inevitably have to undertake retrofits some time thereafter. We do not sell any other product with a 50 year minimum life that is obsolete within two years and do not carry on producing and selling other substandard/dangerous products without risk of prosecution by trading standards officers, so why housing?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Quite possibly if a developer is anticipating a profit margin of x and the cost of building to a higher standard will result in the development costs exceeding sale prices. However I understand that land prices normally represent a third of a build costs, construction a third and generates up to a third of the final sale value as profit. This suggests that if build cost increase, developers will have scope for reducing margins and or land prices should be capped. The latter requires, I assume, action via Central Government.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should adopt Passivhaus Standards until the implementation of the Future /New Home Standards, provided they eventually require builds to an equal or higher standard (The consultation in Jan 2020 appears not to have generated any published drafts?). Subsequent amendments should be implemented as soon as developed.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Assuming central government grants and Council capital resources are inadequate, passage of the Local Electricity Bill would once again make 'community energy' schemes for council owned and private properties viable now that the FIT scheme has ended. The revenue should be diverted to supplement publicly invested funds to finance retrofitting insulation and heating. If this was inadequate funds should be raised by increasing Council tax rates preferably by revaluation of all properties and resetting rateable bands. Demonstration of successful Refurbishment could be eligible for reduced rate banding. Council should therefore petition central government to enact the necessary legislation. To enforce modernisation no property should be transferable without retrofitting.

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?

The policies described appear to be comprehensive (I assume the feasibility of offering to host prototype molten thorium salt reactors (MSR) in each major conurbation across the county, probably Chinese, Indian or the UK's Moltex, to provide safe reliable electricity supplies is zero.). I fear that the innate (small C) conservative nature of our society will resist pretty well every aspect of the policy. This is exemplified by the expectation of a "challenging" implementation: Objections on grounds of subjective aesthetically based "Conservation areas" and "Listed Status" should be bluntly overruled: As far as I am aware no listed building or conservation area employs council "night soil men" to clear privies, cesspits and excrement flung from upper windows into the streets all of which are essential characteristics of our heritage and should have been conserved along with the listed rotting wooden sash windows with "non-safety" glass. Likewise I assume no listed building is served by either a well or lead piping both integral features of past times, all will also have earthed ac electricity supplies, unknown before 1900. I therefore am unable to comprehend why any one may raise any rational objection to making all buildings energy efficient in exactly the same way as they are hydraulically efficient, have guaranteed potable water supplies and are electrically safe, not forgetting free from lead, cadmium and arsenic based paints. Regarding solar panel as too unsightly to be fitted in view is equally risible. Complainants should be invited to spend a holiday in drift coal mine so they can experience the aesthetic pleasure of inhaling coal dust and possibly getting crushed to fully appreciate the benefits of a heritage coal fire in winter drafts. - I suspect on this rock your policies will founder even had you successfully achieved the necessary funding!

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

All green technologies that demonstrably contribute to the overarching aim of carbon neutrality but then monitored to verify if anticipated efficiencies, %s of peak output, predicted meant time to failure or performance degradation are achieved. With many such these are predicted as they will only have undergone simulated aging. Once evidence is available from within the county or externally from earlier implementers the Council can apply the evidence to favour the most successful technologies.

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?

Yes. To achieve carbon neutrality across the County energy production must match or exceed consumption. As a first step the accuracy of consumption assessments should continue to be refined – it would be a failure to aim for a target that subsequently was found to be too low as the problem, although diminished, would remain. Setting it artificially high would impose greater stress on other competing areas of Council business, albeit placing the County on a par with Bhutan as Carbon negative! Once consumption is quantified, it is possible to set appropriate targets not only for renewable energy production but energy savings achieved through energy efficiency measures such as insulation, deployment and usage of EV public transport etc.. Once all available Solar PV sites have been equipped any shortfall in generation must therefore be met by large array Solar PV or wind... there will be a trade-off between the financial and energy costs of retrofitting solar PV installations on existing buildings compared to large scale arrays. Targets must therefore be developed to achieve the best balance.

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?

As inferred/stated against B8 and B10. The aim is to achieve carbon neutrality. This may well demand substantial expenditure of money and additional carbon embodying infrastructure to deliver either an energy saving or energy production measurable in e.g. kWhs. Every building which can feasibly and economically be retrofitted with energy production technologies should be so fitted. Only if the same generation can be achieved elsewhere more cheaply should this not be attempted. As suggested against B8 assessment of locations 'sensitivity' should not be weighed against efficiency, cost and utility. It is improbable that installation of such technologies will prevent a building functioning so energy and financial costs are the only criteria that should be relevant.

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?

The recent Coroner's landmark attribution of cause of death of a child in London to persistent exposure to high levels of air pollution demonstrates that failure to meet EU/UK air quality standards kills people. The evidence suggests that Pm2.5 and Pm1

particles originating from internal combustion engines (ICE) make up a significant proportion of the anthropogenic pollution. This is supplemented by particles from brake linings along with assorted particulates including organic carbon and other compounds derived from agriculture activity where cultivation and spraying of agri chemicals and slurries can add to the atmospheric load.

Hence the Policy should not only aim to reduce ICE emissions by favouring conversion to EV/H2 powered vehicles but a net reduction in the overall vehicle fleet and replacement by EV public transport and a greatly reduced domestic privately owned fleet. The latter pending the development of autonomous vehicles able to serve the entire community suggest the encouragement of shared ownership or community car schemes.

To address the emissions originating from agricultural sources suggest if the legislation is available, enforcement of bans on spraying and cultivation in windy conditions especially during dry periods. Regarding slurry “technologies” already exist for direct injection of slurry instead of spraying which also reduces atmospheric release of NH3, N2O and other N based GHGs. Adoption of no till, use of cover crops, crop rotation and other eco agricultural farming practices will address the full range of pollutants affecting air quality, enhance soil carbon sequestration and minimise soil erosion leading to siltation of waterways and concurrent eutrophication.

To assess these improve the coverage and scope of air quality monitoring – Encourage and exploit findings of citizen science networked monitoring stations.

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?

Reduce fares, increase frequency of public transport where limiting but supplementing it with smaller vehicles if appropriate. In parallel introduce People Friendly Street zones in urban areas with restricted ICE vehicle access. Apply congestion charges to high pollution hot spots.

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?

Salt water battery (SWB) storage from small scale 25kWh to multiple MWh capacity is now feasible. SWB are too slow to charge or discharge but will do so to 100% (Li-ion only to 20%) and are manufactured from readily available, environmentally safe materials and safe to operate unlike Li or Pb acid based batteries and as bulky are useless for EVs but ideal for slow energy storage and release. They are ideal for use in conjunction with Solar PV arrays for aiding network management. An electrician who has installed domestic SWBs, advised me that Cornwall could become energy independent of the UK National Grid by coupling Solar, Wind generation with SWB storage.

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?

The resulting designs should be better and cheaper for the occupants and wider society. Scope for developers to deliver poor quality, badly designed housing at inflated costs will be reduced but hopefully house building will adopt the same pride in delivering a quality product as the aerospace industry.

Given that the 2020 UN EP Emissions Gap Report, the various IEA 2020 Global Energy Outlooks, 2020 World Energy Review and the earlier 2018 IPCC Special Report on 1.5Deg C amongst other reports suggest the world remains on track for a temperature rise of at least +3Deg C (assuming no tipping points are reached), future occupants lives will consequently be happier and healthier in the build up to what may well prove to be a catastrophic era once global mean surface temperatures exceed + 2 deg C and the resulting climate and ecological tipping points are reached generating a collapse of global food supplies, mass migrations, etc. Hence

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

I have hopefully misplaced fears that your colleagues across the Council and wider community may still believe that the Climate Emergency they declared is in some way “not real” or that its consequences will not have any significant impact on Wiltshire even if some distant faraway countries continue to experience events attributed to it and that may well increase in severity and

frequency to the point that THEIR countries become uninhabitable. But this won't affect us and if we continue to directly and indirectly generate GHG emissions at the present levels we are not in any way responsible for the chaos unfolding elsewhere. I suspect that this defensible attitude will be sustained even when neighbouring Dorset, Gloucestershire and Hampshire's coastal town experience tidal surge flooding, and climate refugees are accommodated in Salisbury Plains military camps. Overall I think the document is an excellent start and just hope you can achieve implementation of a fraction of your proposed policies within the necessary time frame to have their designed effect. Thank you

Rep ID: Climate116

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I apologise that this response is a few hours late but it is still March 8th and I do hope that it will still be counted as I believe that the current proposals for the Local Plan up to 2036 are totally inadequate for the serious problems we face during this period with regard to climate change.

The Local Plan as it stands seems to be based on assumptions that precede the declaration of a Climate Emergency in 2019 and also changes brought about in work patterns and vehicle use due to Covid.

It does not include any significant policies to reduce carbon emissions in Wiltshire and if these are not included in The Local Plan it will be impossible for Wiltshire to achieve any reductions in emissions over the next 10 vital years. In fact the plan as it stands in its approach to development will increase them.

It fails to even include a baseline calculation of emissions and is driven by outdated Government housing targets which will increase car dependency rather than reduce them. It does not even attempt to quantify any of the impacts of the Local Plan.

We need, at the very least, a calculation of the County's Carbon footprint, year on year targets and emissions impact quantified.

Major road schemes need to be re-assessed taking into account changes in work patterns and there needs to be renewable energy in some form as well as infrastructure for electric vehicles, cyclists and public transport.

Land needs protecting where necessary but there also needs to be encouragement of local food production and tree planting.

The list of things that need addressing in The Local Plan could go on and on and everything needs a Climate Change Impact Assessment.

At this crucial time I believe that The Local Plan is totally inadequate for the changing world we face and should be completely re-written.

Rep ID: Climate117	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Gladman Developments
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate117
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

Gladman agree in principle with the approach highlighted in Policy Theme 1, which seeks to address flood risk and promote sustainable water management. Gladman are promoting several sites across Wiltshire and the built development in these sites will be located within Flood Zone 1. All Gladman sites incorporate Sustainable Urban Drainage Systems which will be designed as multifunctional spaces to maximise their benefits.

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?

The consultation document states, inter alia, an intention to consider the potential to require a minimum 10% biodiversity net gain requirement for development. It is the view of Gladman that the Council should not look to set a requirement over and above the 10% biodiversity net gain that the Government is seeking to legislate for through the Environment Bill. If the Council were to consider a policy that requires a more than 10% net gain, then this should be properly viability tested. The Council may also wish to look at potential biodiversity offsetting opportunities in the district that development could contribute toward in lieu of onsite gains to ensure achieving net gains does not unduly hinder developments.

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?

Policy Theme 3 outlines all new development should be designed to achieve net zero carbon standards and seek to minimise embodied carbon and environmental impacts through the construction, occupation and modification phases. Flexibility should be provided within subsequent local plan policies to ensure sustainable development opportunities are delivered without pressure from development viability. This may include the phasing of payments/infrastructure alignment with the delivery of housing on a

site rather than requiring upfront payment, in order to minimise upfront cost and associated risk. The adoption of this approach will be beneficial to the delivery rate of a development and will ensure that necessary infrastructure is delivered in tandem as it is required.

Policies related to sustainable design and construction should also cross reference to viability. Specifically, the Council should not seek to jeopardise housing delivery and seek to negotiate an appropriate level of financial contribution that can reasonably be provided without having adverse effects on development viability.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

If the Council wishes to adopt performance standards then it should be justified by meeting the criteria set out in the PPG, including need, viability and impact on affordability. The Council will need to provide robust evidence to justify the inclusion of the performance standards within a policy in the Local Plan.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

Gladman note that the authority's existing suite of transport policies, alongside relevant policies contained within the plethora of Neighbourhood Plans in Wiltshire, already seek to promote the uptake of sustainable travel modes, which is likely to have a beneficial effect in respect of climate change mitigation and adaptation. Whilst we currently have no comments to make on the intention to revisit these policies, we would request that any revisions are proportionate and realistic, and take account of the potential implications for the viability and delivery of development proposals.

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?

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?

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

Overview

7.1.1 It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in paragraph 8 of the National Planning Policy

Framework highlights how the planning system should help to mitigate and adapt to climate change, and support the transition to a low carbon economy.

7.1.2 This objective filters through to other elements of the Framework, including Section 14 that deals specifically with Meeting the Challenge of Climate Change. In this regard, paragraph 148 of the Framework identifies how the planning system should: “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”

7.1.3 Gladman therefore recognise the increasing importance of tackling climate change and encourage sustainable housing developments to mitigate its impact. The Council should continue to take account of climate change in its plan-making, including any updates to guidance in relation to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, competitive economy.

7.1.4 Wiltshire Council have declared a climate emergency and Gladman is committed to contributing towards providing solutions to address these concerns. Gladman takes climate change seriously and our sites across Wiltshire can deliver numerous environmental

commitments to assist the Council in meeting its climate related strategies: Provision of Public Open Space

7.1.5 Well-designed open space will support an active lifestyle, by encouraging people to walk and cycle. It can also assist in terms of climate change resilience, through the provision of tree planting providing shading and CO2 absorption.

Sustainable Transport Methods

7.1.6 Our sites will deliver a comprehensive package of pedestrian and cycle infrastructure which will promote sustainable transport, including a suite of practical measures aimed at reducing traffic impact. All our sites could potentially deliver new bus stops and electric vehicle charging points, subject to further discussion with the Council and relevant stakeholders.

Renewable Energy & Energy Performance

7.1.7 Renewable energy technologies will be considered at the detailed design stage. These proposals will follow energy performance and efficiency targets, using a fabric-first approach to construction with the aim of reducing CO2 emissions.

Construction Management Plan

7.1.8 A construction management plan will be submitted at the reserved matters stage, which will put in place best practice measures such as re-using topsoil where possible, modern methods of construction and keeping landfill waste to a minimum.

Rep ID: Climate118	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Freshford PC (Freshford Parish Council has chosen to respond to this consultation as although Freshford is not part of Wiltshire, the border runs through / around the village and we have a joint Neighbourhood Plan with Limpley Stoke, which is in Wiltshire)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes, it is absolutely realistic as there are numerous areas where carbon reductions can be made as discussed under point 3. It is also essential.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

In order to meet the necessarily ambitious targets a multi pronged approach is required that targets improvements in all the areas discussed under point 3.

A3: How should these actions be delivered and measured?

By learning from and collaborating with other local authorities and countries best practise, whilst encouraging and pursuing new and innovative initiatives.
Using the latest science and technology to measure as accurately as possibly, and constantly reassess what the biggest issues are and where further improvements can be made.

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

No. This is only a starting point and further improvements will be required.

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?

No. We propose policy is formed to safeguard trees and habitat outside of protected areas that do not currently require planning to remove. Such as, sections of woodland, copse, orchards, hedge rows, meadows.
Given, there is a strong drive to plant more trees and achieve biodiversity net gain on developments in order to help address the climate and ecological emergencies, it seems absurd that large numbers of trees, and other areas of habitat outside protected areas can still be removed without any requirement for permission.
In Freshford many trees have been removed which is resulting in a changing landscape. Some 50-75 trees have been removed from Midford Lane alone in the past few years.

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?

No. This is only a starting point and further improvements will be required.

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?

Yes. Other countries can do it so why not us. The most difficult hurdles won't be practical but changing the construction industries mindset, and overcoming vested interests.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

No. Not once the additional costs are factored into land values.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

We would like the same policy as Banes adopts used. Which will we hope be The Future Homes Standard, following their consultation.

We propose additional policy is required to ensure the energy standards set, are also delivered. It is well documented that house builders cut corners in areas such as insulation detailing and air tightness. This might be addressed with policy ensuring more extensive checks and testing are conducted of all new build homes, and not just a small percentage on sites of multiple homes. Greater accountability for those responsible for testing and inspecting homes might also be introduced to ensure standards are properly maintained.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Help educate homeowners about all the home improvement measures they might consider including simple DIY ones, where to source grants, trusted tradesmen, other sources of information. Employ surveyors to visit communities and conduct surveys on mass.

Employ home improvement experts to conduct home improvement workshops in communities. Adapt planning policy to make it easier for owners of listed or properties in conservation areas to more easily carry out home improvements, such as double glazing.

Find alternative ways of engaging with members of the community who may not spend a lot of time online e.g. churches, village shops, parish councils, community groups, pubs etc. Consult with Parish Councils such as ours, which have recently held a Community Climate Change Forum to gather information on people's thoughts, concerns, ideas... Encourage and support other Parish Councils to hold Community Climate Change Forums. The response to ours was very positive and worthwhile.

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?

No. The measures will have to be far more extensive. Learning from and collaborating with other local authorities is likely to be worthwhile.

We would like to see more support and policy changes to aid community renewable energy projects, in line with the changes Banes is consulting on and we support.

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

No. Different areas within Wiltshire will be better suited to different technologies. Therefore research is required to assess what is most suitable where and each case should be judged on its own merits.

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?

Yes, we would like a target of 100% renewable energy by 2030.

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?

All possible measures. Support and planning policy change is required to aid the installation of building improving measures, that don't detract from listing or conservation status, or where any negative aesthetic impact is clearly outweighed by the energy savings of a measure. Policy for approved double glazing for listed buildings and conservation areas is needed.

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?

No, these measures don't look sufficient.

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?

Policy to ensure EV charging points are required in all new residential and commercial developments. Policy and grants to support community initiatives to install EV charging points.

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?

We don't feel sufficiently well informed to comment.

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?

Good planning policy should ensure this drives innovation and quality design. The market will demand that land values adjust to allow for these additional costs so new more sustainable schemes will be viable.

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

Rep ID: Climate119

Consultee code: Other Advisory Bodies

Consultee Organisation (if applicable): Ministry of Defence

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate119

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

As a Central Government department, the Ministry of Defence (MOD) is mandated to support the delivery of the Government's sustainability objectives and contribute towards the UN Sustainable Development Goals. In a defence context sustainability is about ensuring that we are resilient and adaptable to enable us to respond to future risks and address the implications for defence capabilities, whilst respecting and minimising the impacts on the environment, availability of resources, changes in the climatic and geographical arena, at home and abroad. The MOD has a policy instruction of "A Net Zero and resilient infrastructure – designed, constructed and operated to enable decarbonisation by 2050".

Already the MOD is delivering a number of projects such as delivering Net Zero Service Families Accommodation sites: through retrofitting existing SFA with PV / battery storage and requiring developers to ensure Net Zero standards are met on new SFA developments.

Also, the Prometheus Project is looking at provision of PV developments to provide on site renewable energy on Army sites across the UK (some are already being delivered).

Other renewable energy projects across the defence estate will inevitably mature over the life of the Wiltshire Local Plan.

Rep ID: Climate120	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>No. This document identifies transport on road as the highest proportion of carbon emissions in Wiltshire and therefore it should be the target of policy making for reduction. I have not seen anything in the Local Plan documents to suggest that this has been understood by Spatial Planning and Transport planners. Housing developments should stand on their own merits and presence of amenities and employment, not be used to justify building roads as in Chippenham and Melksham, or be on greenfield sites far from city and town centres in preference to brownfield land. Such policies seem designed to lock in carbon emissions for at least another generation at today's level. The Plan will not be adopted until 2023 at the earliest which gives 7 years to achieve Wiltshire's target of zero carbon by 2030. The present plan gives no confidence that this trajectory will be achievable</p>	

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

Change direction from building out of town developments that encourage car use and prioritise building on brownfield sites in or near employment, education, shopping and leisure with a high proportion of affordable housing. Avoid building on greenfield land. All housing to be built to the highest standards of insulation and with renewable heating systems to future proof them. Major investment in public transport, walking and cycling in accordance with the acknowledged hierarchy in the Transport Review.

A3: How should these actions be delivered and measured?

By planning officers actually accepting that building developments without proper links that prioritise sustainable and active transport are not what is necessary to achieve carbon emission reduction. By monitoring all the things listed in Appendix 1 to inform decisions and implementing them. By looking at best practice from other authorities and learning from them. By implementing some of the measures that have been planned for decades. By persuading the general public that car use even if they are all electric is not the answer to a healthy and sustainable future.

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

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?

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?

More priority needs to be given to addressing the heating and energy generation and conservation in existing buildings. Addressing new build is important but this is a relatively small proportion of houses and other buildings as most new developments have already been given permission or have been constructed. Replacing gas boilers with heat pumps is costly and other technologies are not yet available and unlikely to be ready for introduction during the plan period. Ensure building regulations keep up to date with emissions reduction or set a Wiltshire wide set of regulations to a higher standard

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?

Only if planning officers insist on developers building-in climate resilience and do not rely on owners retrofitting measures later that are costly and much cheaper to provide as standard during construction

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

probably, given our planning officers' and members' reluctance to step out of line with anything that developers object providing and the policies outlined in the Plan that do not support sustainable development in any practical sense

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I am not sure there are any legal barriers to prevent design standards being made higher than building regs allow, it is the threat from developers to withdraw from plans that presents the biggest disincentive

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

the Council cannot compel house or other existing building owners to change to more sustainable energy usage and lacks the resources to assist private owners to do this. They can deal with their own building stock but have limited opportunities to do anything else without considerable Government support

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?

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

All technologies should be encouraged and favour those that are appropriate in different situations, one size does not fit all.

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?

Of course, measured by recording existing installation and monitoring new installations as they are fitted using planning and building regs approval. Ambitious targets should be set based on what has already been achieved as a baseline and increase year on year

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?

Follow best practice in other authorities, there are many examples of how to do this worldwide where there are pressures on implementation from historic buildings and landscape conservation

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?

There is nothing in the Transport Review that would contribute to improvement in air quality, concentrating as it does on making driving easier by providing more road and roundabout capacity. Land use planning needs to move away from out of town development on greenfield sites that encourage car ownership and use in favour of brownfield sites in or near city and town centres. High priority should be given to the hierarchy of interventions detailed in Appendix A, Table A2

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?

See above, prioritise the hierarchy of interventions. It is telling that the only schemes that seem to have detailed plans available are major road schemes that are designed to prioritise making car travel easier and quicker and little detailed planning appears to

have been done for public transport, walking or cycling. New road schemes need to have assistance for sustainable modes built in right from the start, not added as an afterthought

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?

I am not sure that the grid system cannot cope as it seems to have capacity and we should be seeking to reduce car use by encouraging car sharing and building better facilities for sustainable modes

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?

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

Rep ID: Climate121	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Barratt Homes	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate121
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?	
<p>It is not anticipated that the LPR will be adopted until Q2 2023. Between now and then the Government has indicated that there will be significant changes at the national level in regard to climate change and biodiversity net gain. It will therefore be necessary for the LPR to be mindful of the changes to the national legislative regime, in particular in regard to Future Homes Standard, biodiversity net gain, energy provision, and electric vehicular charging.</p> <p>3.2 Barratt have committed to becoming the country's leading national sustainable house builder and have published a sustainability framework which aligns their ambitions with the UN Sustainable Development Goals⁵. It is these goals that are referenced in the dNPPF, at paragraph 7, and are being used by many Authorities in setting the sustainability framework for emerging Local Plans.</p>	

3.3 This commitment includes new homes design to be net zero carbon from 2030; with improvements towards this standard made over the coming 9 years, pre-empting the Government legislation by committing to biodiversity net gain from 2020, and seeking to increase the use of Modern Methods of Construction to 25% of homes by 2025.

3.4 Barratt welcome the commitments set out by Wiltshire Council in seeking to actively address climate change and biodiversity net gain through the LPR; and commit to working positively with the Authority to deliver enhanced sustainability standards over the coming years. The scale of change required in the industry is substantial, and it is necessary to ensure that developers and Authorities work collaboratively to the end goal of zero carbon in a phased process – which sets the step change in standards at a rate which is deliverable by the industry.

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

By far the most significant opportunity to address climate change and reduce carbon emissions is through a spatial strategy which promotes sustainable patterns of growth, and maximises the opportunities for sustainable travel.

Central to this is understanding where people live and work, and the opportunities for walking/cycle and public transport to create modal shift. This will also need to be informed by changing working patterns as a result of Covid. This should inform the distribution of housing within the spatial strategy. We have not seen any analysis in this regard – and the focus on the delivery of two bypasses as major indicators for growth appears fundamentally opposed to this objective. The LPR should look beyond the building of roads, and consider opportunities to changing travel behaviour. We note for example, that Westbury has a significantly high level of self-containment in terms of jobs/housing; the second highest destination for jobs is Trowbridge; and a not insubstantial number of residents work in Bath. Both Trowbridge and Bath are accessible by rail.

The Western Gateway Strategic Transport Plan 2020-2025 identifies the intention that the Bristol/Bath MetroWest rail services be extended to Westbury – with this a ‘short-term’ project for delivery by 2025; with the provision of enhanced regular train services to Bristol and Bath. The opportunity that this provides to deliver housing in a location which is highly accessible to key strategic employment destinations has been overlooked within the evidence base.

A3: How should these actions be delivered and measured?

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

We agree with the measures set out in the consultation document, and it will be necessary to demonstrate that they are compliant with the Framework. In line with the NPPF, there is no need to duplicate policies from the Framework (paragraph 16) in the LPR.

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?

We support the intention of the consultation document in emphasising the importance of blue and green infrastructure. The emerging Green and Blue Infrastructure Strategy (GBIS) needs to be published in full as part of the evidence base informing the LPR, as it is difficult to comment on the individual maps provided within the contextual information.
3.11 We suggest that the concept of the GBIS is amended in the LPR to align with the national requirement to create Nature Recovery Networks.

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?

As set out above, Barratt Homes committed in 2020 to their homes being net zero by 2030; and will be moving towards this target over the 10 year period. The Government have subsequently published its response to the consultation on the Future Homes Standard – with this confirming a two-stage approach to reach ‘carbon ready homes’ by 2025 (being a 75% reduction in carbon emissions). The first stage in reaching this target has recently been published with draft Building Regulation changes at consultation. Barratt Homes remain committed to their net zero target, and will be aligning the stages in reaching net zero by 2030 with the Future Homes Standard. This reflects the need to develop supply chains, skills and construction practices. Where there are opportunities to go beyond Building Regulations – these will be explored, and there are numerous examples of Barratt

Homes doing just that such as the first ever large scale zero carbon community at Hanham Hall. At present, these schemes are individual, based upon site specific characteristics (and viability), and we do not consider that a Wiltshire-wide zero carbon homes standard would be achievable or deliverable in the short term.

In bringing forward local policies which differ from national standards, or are implemented earlier, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

The Future Homes Standard includes the decarbonisation of energy, and there are also individual legislative changes coming forward, for example the forthcoming ban on gas boilers. There are a significant range of low carbon/renewable energy technologies available for new homes, and the sector is constantly evolving. We suggest that the LPR should not set out a preferred type of technology – and that it will be for the individual site conditions to determine which represents the best opportunity both in terms of feasibility and viability. In bringing forward local policies, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

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

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?

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?

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?

We set out our comments above on the role of sustainable travel choices and modal shift in underpinning the spatial strategy; and this is intrinsically linked to addressing air quality.

In regard to the installation of smart charging, we note that a Department for Transport 2019 consultation considered potential regulations in this regard – and this included analysis of the ability to deliver this at scale; including indicative costs, and also the implications on the capacity of the electric network. This indicated that in some instances, the costs would render a scheme unviable due to grid capacity constraints. We therefore welcome the intention of the Council to engage now with the network operators to produce the evidence base on the costs associated with the network upgrades and the cost of installation. This will need to be factored into the Viability Assessment and Infrastructure Delivery Plan (IDP) supporting the LPR. Any policy requirement should be based upon an assessment of need – both current and future, and should balance the need for passive and active charging.

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?

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?

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?

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

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Rep ID: Climate122	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Tetlow King Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): South West Housing Association Planning Consortium	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate122
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?	
Climate Change is high on the government's agenda with the national target of net zero carbon emissions by 2050. Wiltshire Council, like several other local authorities in the south west, is committed to be carbon neutral by 2030 and the HAPC supports this objective.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

A3: How should these actions be delivered and measured?

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

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?

Biodiversity Net Gain

It is pleasing that the Council is taking a pro-active approach to environmental issues. The NPPF encourages opportunities for biodiversity net gain but does not specify a measurable target. The Environmental Bill proposes a 10% increase in biodiversity net gain on sites that require an Environmental Impact Assessment, although this has yet to be passed through the House of Commons. Considering this, it is likely the greatest increase proposed by legislation will be 10%. If in the future the Council looks to impose a biodiversity net gain target that is significantly higher than those presented by legislation, it should be robustly tested to ensure that it is a realistic requirement to impose on applicants.

The Local Plan should give or signpost guidance as to how applicants should practically achieve biodiversity net gain with regard to development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Yes, a move to zero carbon development would have a material effect on scheme viability, particularly with respect to affordable housing schemes. There are common concerns regarding the costs for housing associations with regard to all the of the modern technologies that are often required to be able to develop zero carbon sites. Nonetheless, as Housing Associations we recognise the critical role that we play in ensuring that residents have safe, secure and efficient homes that are future proof. The HAPC therefore backs the Council's endeavours to show support for the delivery of zero carbon development where the Council can show that zero carbon development is a realistic prospect for housing associations through viability testing. While such environmental initiatives are essential for futureproofing our communities, they should not as a result dramatically restrict the delivery of much needed affordable housing in Wiltshire.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate123

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Barton Willmore

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Bloor Homes South West

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate123

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Whilst broadly supportive of climate change and biodiversity net gain measures, we agree with the representations submitted by the HBF on these proposed policies.

Any new policy measures need to be based upon a proportionate evidence base to be found 'sound' and this should include an assessment of their impact upon viability; both on an individual site level and on a whole-plan basis to ensure that other policy aspirations are not unduly impacted (e.g., affordable housing).

Viability will be a key issue in determining the soundness of the LPR. The viability of individual developments and plan policies should be tested at the plan making stage. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound Plan and the housing requirement not being met. This will be particularly important in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. This further lends support for the identification of deliverable sites when allocating housing land, such as that proposed at land to the north and west of Manor Farm.

Rep ID: Climate124	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): GLP	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate124a (Fullrep) Climate124b (Specific appendix mentioned in the text)
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?	
Given the time lag between the delivery of any new development determined in accordance with new policy in the adopted Wiltshire Local Plan Review and its actual adoption date it is unlikely that existing carbon emission trends can be significantly reversed before 2030. It is important to note that any new proposed policy will be required to be subject to whole plan viability testing.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

Implementing new policy will assist in delivering future development that assists in reducing carbon emissions in the long term. By allocating sites in sustainable locations accessible by a range of sustainable transport options and by encouraging the use of best practice sustainable and innovative modes of construction the Local Plan will assist the built environment in reducing carbon emissions in the long term.

A3: How should these actions be delivered and measured?

The construction industry awards certification to new development that meets high sustainability; health and zero carbon credentials. Our client consistently delivers award winning new employment development – see Appendix 9 for details of the GLP Sustainability Journey and UK BREEAM excellent developments.
The Local Plan could monitor consents/completions that meet such as BREEAM excellent; WELL Silver.

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

The Local Plan should ensure that all new development is located within flood zone 1 – including all new development sites at Royal Wootton Bassett. Some sites at the town proposed to be taken forward for further consideration are situated in flood zones 2 and 3, (sites 462, 463, 498, 3156, 3357). Our client's site at Spittleborough Farm is located in flood zone 1. The WLPR needs to ensure consistency with regard to emerging climate change policy and emerging site allocations.

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?

Our client' site at Spittleborough Farm can provide extensive new blue and green infrastructure as evidence by the Parameters Plan at Appendix 5 including 20-30m planted landscaped buffers along northern and western boundaries, and on-site surface water attenuation with betterment.

Our client's site is key to implementing WLPR 'Green and Blue Infrastructure (GBI) corridor 7: River Ray Lydiard Green Tributary' plus the site provides the opportunity to increase tree cover as part of 'The Great Western Community Forest' – see Appendix 6. New blue and green infrastructure proposed will contribute to biodiversity net gain, surface water attenuation, climate change mitigation and air quality improvements through extensive on-site planting.

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?

The measures set out are considered to be adequate.

The WLPR should encourage those already delivering cutting edge and award winning development to invest in the County in order to ensure certainty that new development will meet the highest industry standards and deliver on WLPR zero carbon and climate change ambitions.

Our clients have delivered employment development at Milton Keynes and Lutterworth that has been awarded BREEAM Excellent and uses Eco-Template Design and Eco-Passport Materials.

Our client has been awarded 'The Planet Mark' by the Eden Project in recognition of significant reductions in their carbon footprint and commitment to continuous improvement in sustainability.

Further details of the international sustainability organisations our client partners with are attached at Appendix 9.

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?

It will not possible for all new development to be zero carbon rated from 2023 but what can be achieved are measures to reduce carbon in construction. Appendix 9 illustrates how our client achieved a 25.8% embodied carbon reduction at an employment development at Milton Keynes in order to achieve the Eden Project 'The Planet Mark' status.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

For those developers already delivering development with high sustainability credentials such matters are already built into investment decisions, however any emerging carbon zero and climate change policies will need to be viable in the context of a whole plan viability assessment.
Access to development finance and demand from occupiers for low carbon buildings for employment purposes will affect zero carbon construction as well as planning policy.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

No comment – our client already delivers award winning employment development over and above industry standards.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

All technologies that provide green infrastructure should be encouraged as new technology will emerge and develop over the plan period.

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?

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?

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?

Increasing self-containment, reducing the need to travel plus investment in public transport and active travel will all assist in improving air quality in Wiltshire.
Development of our client's site at Spittleborough Farm for employment will improve self-containment within Wiltshire, could contribute to identified public transport improvements for Royal Wootton Bassett and will deliver new active travel linkages including part of an identified Sustrans cycle route.

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?

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?

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?

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

Appendix 9 [Renamed Climate124b] evidences our clients 'Sustainability Journey' with regard to a commitment to delivering award winning employment buildings to meet the emerging needs of the business sector both in the UK and overseas. It is noted that accreditations received relate not only to the built form of development and its carbon lifecycle but also the suitability of a development to the health and well being of those who work there through the WELL accreditation.

Rep ID: Climate125	
Consultee code: Other	Consultee Organisation (if applicable): Great Bedwyn Climate Action Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>No, the Local Plan is not nearly radical enough to deliver the large emission reduction required (in Wiltshire) to reverse current carbon emission trends – the time left to achieve this is less than 9 years. This is made more acute as the plan implementation has been delayed by 2 years. It will be much too little, too late at the current progress rate.</p> <p>This plan is about Wiltshire, as a whole, moving to net zero and beyond not just WCC estate. Success will require the WC to use every possible lever and work with many different organisation to turn the tank round.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

1. Stop taking decisions that increase emissions (eg Westbury gas incinerators) and approving housing developments that do not meet zero emissions standards.
2. Quantify the impact of every decision and make sure it counts as much as possible towards decarbonisation
3. Introduce a carbon tax on materials, activities and behaviours to fund carbon reduction and incentivise change.
4. Focus on the biggest problem areas: Transport is clearly a very high emitter of emissions. WC needs to find ways of significantly reducing numbers of car journeys eg car sharing and active transport
5. Give approval to wind generators – cheapest form of renewal energy that complements solar energy. When the sun does not shine, the wind often blows, and it blows at night too!
6. Store (solar) energy to help even out energy demand and usage
7. Support local communities to enable them to decarbonise their buildings eg schools and housing Local communities understand what is possible and what opportunities there are
8. Help residents to change their behaviours eg support green (public) transport, reduce meat consumption, re-use, repair and share

A3: How should these actions be delivered and measured?

1. Divert funding from emission generating schemes (eg road building) to local communities together with careful management of the spending to ensure that it meets carbon reducing criteria (see Salix public sector decarbonisation fund calculator)
2. Use a carbon tax to generate a fighting fund and change behaviours
3. Impose a requirement on housing and other developers to demonstrate social, environment and economic benefits in line with a 'just transition' from fossil fuels to net zero. Ie building back better. This would be critical to supporting community energy and climate action projects working with partners from different sectors
4. Embed climate change understanding in school curricula – it is almost completely lacking in school teaching at the moment

Measurement: Each decision needs to be pre-assessed for its likely carbon impact. Each decision that does not save enough emissions should be rejected. (multi-factor impact assess methodology is well understood and has been carried out in healthcare for many years)

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

In my opinion developing the Green/blue infrastructure is essential and the current measures don't go far enough. Plans should focus on natural solutions which will help maintain biodiversity and could include:

1. Reinstating flood plains and water meadows to ensure that water flow is slowed in valleys where there is a risk of flooding
2. Do not allow building on existing flood plains
3. Work with farmers and other landowners to recognise and re-instate old methods of flood management (in Scotland they are using beavers!)
4. Ensure ditch clearing is mandatory and undertaken annually eg on Somerset levels
5. Stop covering large areas with impermeable tarmac which increases run off

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?

Probably no, but WC needs experts to model different combinations of solutions to draw clearer , evidence based conclusions. The key issue is how much people will change their behaviour.

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?

No – it will take too long and cost too much, even if we knew how to do it.

We need to develop a far more circle economy with more -reuse and repair and sharing alongside encouraging and incentivising people to change their behaviour (=difficult!).

1. Use a carbon tax mechanism of development s, goods and behaviours to help people to change

2. WC could support the development of community based 'repair shops', stop the sale of good that are not repairable and penalise people who discard goods that are repairable.
3. More could be done to reduce food waste, including farmers not wasting crops that are substandard
4. Support sharing of cars, household items (eg washing machines, other equipment, toys) and living spaces (co-housing)

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?

We do not have any hope of achieving net zero by 2030 at the rate at which Wiltshire, the UK and the world is moving. WC has to be prepared to take much braver and more difficult decisions than it has done to date. It appears to be more influenced by commercial lobbying than by the careful analysis carried out by its officials. WC needs to invest for the future rather than for short term gain or crisis management

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

New schemes should not go ahead unless they are carbon neutral. The overwhelming priority should be to make changes which reduce emissions. All new developments need to be justified in social, environment and economic. Any new development should have pass the green impact hurdles before being approved.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

I am not a technical expert so don't know how green the current Building Regulations, or the Government's proposed 'New Homes Standards are. They should be changed to require materials carbon neutral or be 'carbon taxed' - there are plenty of low carbon material now eg wood and 'hempcrete'. Good regulation and the education of builders would be required if all future material usage were to become greener . The system needs to be cheat proof, otherwise we might end up with more Grenfell Tower disasters.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Some ideas to encourage people to go green and to use energy efficiently include:

1. Reduce 20% VAT tax on green materials, require their use and tax materials with high embodied carbon
2. Educate builders so that they understand how to make their building methods greener eg fitting Air source heat pumps (there is an acute skills shortage)
3. Give grants to people with small houses to insulate, draft proof and change their heat sources – not to everyone
4. Require builders to put green heating (eg district heating systems) in new housing developments – which if houses are built to net zero standard, should not need much energy
5. Ensure listed buildings meet new energy usage standards
6. And.....

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?

I doubt very much is this would be enough. Experts can give you an answer to this

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

The Council should favour the most cost effective technologies that produce green energy and encourage efficient energy usage.

- Green generation = wind turbines and PV solar power
- Greener usage = Good insulation, heat pumps, LEd lighting, combined heat and power systems

- Storing energy = battery, water or gas storage are all possible

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?

Yes, the Council should set targets as a way of measuring progress towards the stated aim of Zero Carbon by 2030. Targets should be stretching, smart, responsive, timely and progressive.

Organisations that fail to meet the standards should be penalised through carbon taxes.

I am not the right person to say what the targets should be, you have experts to do this

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?

The same standards should be applied to listed buildings. This will require that conservation standards will be reduced. The inspectors who supervise changes in listed buildings need to understand that energy conservation and efficient usage is now more important than meeting the building standards of the past and that it is possible to compromise and do a bit of both

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?

Air pollution is not generally a big issue in Wiltshire except in certain town centres eg Marlborough. The Council should ban and fine people sitting in their cars/ vans /lorries/buses etc with engines running – buses are often the worst offenders. Ambulances would be exempt where they are carrying patients.

The Council should identify the bad spots in the County and take appropriate action to reduce the sources of pollution eg ban cars, increase public transport access, encourage active transport

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?

Reduce the speed limits on all roads to 50mph and 60 on motorways
Increase local small buses not large buses
Review bus routes so that they meet local needs better eg Link more buses routes to train stations
Invest in cycle routes and prioritise mending pot holes and road edges which make cycling very dangerous
Invest in EV charging infrastructure linked to stations and other transport hubs

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?

The grid was created on a 'fit and forget' basis and in many places, we don't know how 'strong' the grid. As EVs and heat pumps become more common, surge moments (eg after a power cut) are likely to be too great for the infrastructure. DNOs and DSO can help increase the efficiency of the grid. At the moment it is quite complicated and expensive to connect new PV installations to the grid and sell excess energy back the grid. Simplistically, DNOs and DSO need to focus on:

1. Understanding their local grid infrastructure
2. Finding ways of balancing the use of energy eg incentivising people to fill up their EVs at night when the energy demand is low
3. Explore ways of storing energy – battery, water or gas storage
4. Encourage more local generation of electricity to meet demand – particularly wind and solar power

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?

Green houses would be more expensive to build (or retrofit) in the short term but their energy costs would reduce
More investment and time should be spent at the outset of a project in getting a thoughtful good green design that works well as part of the system. This stage on a process is often rushed and mistakes are often made.

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

In the future when it gets hotter, we will need air conditioning (to sleep comfortably) which will increase energy demand but we may need less heating in the winter.
Understanding likely future demand through modelling different scenarios is important. WC could consult the Energy Systems Catapult <http://es.catapult.org.uk/capabilities/modelling/> which has been working on this for the last 5 years.

Rep ID: Climate126

Consultee code: Other Advisory Bodies

Consultee Organisation (if applicable): National Trust

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

From a National Trust perspective, climate change is the single biggest threat to the precious landscapes and historic houses we care for. We are also playing our part to improve the condition of our own land for nature.

We would encourage Wiltshire Council to have a high level of ambition when it comes to responding to the climate and ecological emergencies through Local Plan policies. We have seen local authorities such as Dorset, B&NES and Stroud consult on policy options which appear to have a high level of ambition, and we would encourage Wiltshire Council to take the same approach. The Local Plan Review should be a step change in its approach to climate and ecology compared to the existing Local Plan.

Rep ID: Climate127

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Barton Willmore

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Bloor Homes South West

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate127

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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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?

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?

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?

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

Whilst broadly supportive of climate change and biodiversity net gain measures, we agree with the representations submitted by the HBF on these proposed policies.

Any new policy measures need to be based upon a proportionate evidence base to be found 'sound' and this should include an assessment of their impact upon viability; both on an individual site level and on a whole-plan basis to ensure that other policy aspirations are not unduly impacted (e.g., affordable housing).

Viability will be a key issue in determining the soundness of the LPR. The viability of individual developments and plan policies should be tested at the plan making stage. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound Plan and the housing requirement not being met. This will be particularly important in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. This further lends support for the identification of deliverable sites when allocating housing land, such as that proposed at land to the west of A365, Shurnhold.

Rep ID: Climate128

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Copperfield

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): David Wilson Homes

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate128

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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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?

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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?

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?

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?

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

David Wilson Homes supports the need to respond in a proportionate manner to Climate Change and to explore this in a way which is aligned with 'whole plan viability' testing. It is also recognised that travel can be a significant contributing factor to Climate Change. However, whilst the plan seeks to focus on supporting settlement containment, this does not always address

the real issue of how people make necessary commuter journeys for work and the distance they travel. With a polycentric settlement pattern like in Wiltshire, it is important to understand how people travel for employment and determine how these journeys can either be made shorter or by alternative means to the private car.

In this context, it is suggested that the Council clarify what level of in-commuting takes place to the Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson/ Chippenham Gateway area as a major employment area surrounding J17 (M4). This would help to determine whether the proposed dwellings at Hullavington is sufficient over the next 20 years to enable those who wish to live near these work destinations to have access the local housing market rather than travelling from places like Chippenham, Calne, Royal Wootton Bassett, Corsham and Malmesbury. To illustrate the point, the extract from Datashine Commute below illustrates in-commuting to this location for work purposes. Looking more widely at sustainable design and energy management, including electric vehicle charging points, it is important that the emerging plan is aligned with other emerging legislation and guidance. For example, Wiltshire Council should be mindful that the Department of Transport held a consultation on Electric Vehicle Charging in Residential and Non-Residential Buildings in October 2019. It set out the Government's preferred option to introduce a new functional requirement under Schedule 1 of the Building Regulations to provide for electric vehicle charging points. Building Regulations are also likely to guide other carbon reduction measures and the emerging Wiltshire Plan should remain in-step with this and not pre-emptive.

Like many local authorities, the emerging plan sets the intention to delivery net carbon zero by 2030, well ahead of the Government's target. Whilst this is supported by David Wilson Homes, it must be put in the context of whole plan viability to be deliverable.

Regarding 10% net-biodiversity gain, this is likely to become mandatory through the forthcoming Environment Act (currently the Environment Bill). The suggestion that these should be managed and maintained for a period of 30 years is also consistent with the emerging Act. However, should any changes occur as the Bill is translated into legislation, the emerging plan should reflect them. Delivering all development as net carbon zero within 24 months is a significant change over a short timeframe. Wiltshire Council is urged to consult with the development industry about the how this could be achieved and what impacts it may have on viability and deliverability and other S106 planning obligations. Some brownfield sites for example may become unviable when the extra costs of remediation are taken into consideration.

In terms of alternative energy sources and generation, it is important that the plan signposts options, but does not prescribe them. Different sites and locations will benefit from different energy strategies to meet the Government's targets set out in the new Building Regulations. Without providing the development industry with some flexibility to use different approaches, there is a risk that some sites will stall or not be delivered.

Rep ID: Climate129

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:

N/a

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?

One certainly hopes so! Everything needs to be done to significantly reverse existing carbon emission trends.

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

The Council should follow 'good practice' from wherever that can be found, implementing good ideas and suggestions to reduce emissions.

A3: How should these actions be delivered and measured?

By the best means possible – there are plenty of wise and sensible ideas available out there amongst the experts, scientists and specialists (people very much better able than me to advise the Council)

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

Again one sincerely hopes so! These ideas need implementation in full. If they don't match up to expectation then listen to the wise heads who will offer good advice.

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?

We need to commit ourselves to the full range of appropriate techniques taking into account the existing natural capital and doing our best to increase the further provision of suitable biodiverse habitats and landscape features

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?

We don't know! We have to make the effort to again commit time, effort and money to make sure that we do achieve a net zero future

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?

Ask the current government whether they will give financial support to Wiltshire Council's efforts.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It may well but developers need to be given the financial incentives to ensure new schemes are both environmentally and financially viable

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The current government seems intent on 'watering down' Building Regulations. Wiltshire needs to adopt the 'very best practice' (of which there are many examples both nationally and internationally)

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

As well as it can! – utilising 'green funds' for the schemes

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?

I do not know but I hope they will.

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

The Council should encourage all technologies both within and without the county boundaries

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?

Yes but again one asks the question as to how much of the energy the county uses can be produced from within

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?

Again – all steps should be taken using the expertise that is available

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?

I doubt it due to the county's reliance on fossil fuel for transport; modal shift needs to be better encouraged, communities need to be of the 'fifteen minutes to anywhere doctors, shops etc' style

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?

As many as are possible, practical and funded by central government

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?

All measures that are being suggested by the appropriate experts

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?

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

I'm an [TEXT REDACTED] with a more than passing interest in biodiversity, energy issues, building standards and climate change. I feel quite pleased to have got this far through the absolute mass of documentation that is available for this Local Plan consultation. Next time please try to present the public with a simpler and more straight forward consultation.

Rep ID: Climate130	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Bremhill Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
Yes. This is what the plan must do but as the answers below show it is not on course to do this.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
It should be a local employment led plan to radically reduce the level of out commuting for work and reduce the dependency on travel by car. Housing numbers should meet the local need and not attract people from outside the area and add to the out commuting. Fewer houses would negate the need for the road infrastructure with its massive carbon footprint. Integrated sustainable transport options within the local area where people would live and work should be developed such as electric buses,	

safe cycle routes and electric charging point access for all residents and businesses. Developers should be held to account on meeting the net carbon zero requirement with enforceable penalties if they do not do so.

A3: How should these actions be delivered and measured?

They should be measured in terms of net carbon emissions. These should be measured in advance of the local plan being submitted so a proper comparison between sites can be made. The means of monitoring the carbon emissions of developments should be set out in the plan.

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

No. Flood risk is being exacerbated by climate change. Building on some sites will increase flood risk elsewhere as in the case of the East of Chippenham site where the risk is for flooding downstream on the River Avon at Chippenham, Melksham, Bradford on Avon and Bath. Projections for the more intensive rainfall events show that land currently adjacent to flood plain will become part of the flood plain in future. Relying on SUDs to address this risk will not be sufficient. Rather such areas as Site 1 should not be built on.

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?

No. Enhancing natural capital means not destroying it in the first place. The “nature” measures in the plan in no way off set the destruction to natural capital in the first place by building on greenfield sites.

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?

No. Any benefits in design and construction will be cancelled out by the huge development itself such as release of carbon through excavation, removal of carbon sinks and the use of concrete and asphalt including that used in the roads and bridges.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate131	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): DLP Planning Limited
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Devizes School & Sixth Form College	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate131
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<p>DS&SFC supports the Council's ambitions to make Wiltshire carbon neutral by 2030 and to take steps to tackle climate change through the Local Plan. One way to help achieve this is to maximise development and allocation of sites in sustainable locations within the boundaries of existing settlements, where residents will have access to services, amenities and public transport connections without the need to use a car. Development within existing settlements would also help to conserve environmentally sensitive and protected sites beyond the existing built up area.</p>	

DS&SFC is proposing part of the Devizes School site to be included as a housing allocation within the Wiltshire Local Plan. This site is located in a sustainable, town centre location that would help contribute towards meeting the Council's climate change objectives. The allocation and development of this site would align with the Council's fifth policy theme of 'Promoting sustainable transport, active travel and improving air quality' by aligning new housing with access to existing services and facilities, increasing self-containment within an existing settlement, reducing the need to travel and encouraging use of active travel and public transport modes. This type of sustainably located development is particularly important in Devizes, which has an existing Air Quality Management Area and a need to improve air quality. By reducing reliance on the private car, this proposed allocation site would help to meet this objective by helping to tackle air quality and addressing the associated effects on climate change. Further details on the Devizes School site that is being promoted as a housing allocation by DS&SFC are provided in section 5 of this report [Climate131].

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate132	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): The Society of Merchant Venturers	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate132
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?	
<p>3.2.1. A specific policy that encourages a 'proactive approach' to climate change mitigation and adaptation through design would reflect paragraph 149 of the NPPF, as well as reflecting the objectives of the Climate Emergency. This approach is therefore generally supported and should make a contribution towards reducing carbon emissions.</p> <p>3.2.2. It will however be important that such a policy should incorporate sufficient flexibility without setting prescriptive requirements as to how these aspirations are met. A target reduction in energy consumption over and above building regulations could be established (subject to being supported by evidence) however, the policy should not set out prescriptively how this should be achieved. For example, it should not include a specific proportion of energy consumption to be provided by a certain type of energy.</p>	

3.2.3. Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.

3.2.4. Further, such a prescriptive policy would not take account of the fact that all policies should be focused on energy reduction in the first instance. The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'allowable solutions'.

3.2.5. Appropriate account must also be taken of the financial and viability implications of any such policy, and additionally the financial and viability implications when considered cumulatively with other policies, to ensure that the delivery of housing and other objectives is not compromised.

3.2.6. The Council must ensure that any new requirements are justified through robust evidence and will not inhibit the delivery of much needed housing. New policies must also ensure they accord with latest national planning policy and guidance.

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

Residential development in particular should be required to reduce energy consumption in the first instance through a fabric-first approach, prior to considering the use of renewable and/or low carbon energy either on or off-site alongside potential offsetting measures.

3.2.8. The policy should also incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met (for example policies should avoid requiring energy to be provided via a specific method, e.g. solar panels, district heating).

3.2.9. As part of achieving 'net zero carbon', measures such as off-setting and allowable solutions should be considered. As part of the consideration of off-setting and allowable solutions, we would therefore welcome details as to how the cost per tonne of carbon/ other measures associated with allowable solutions will be calculated to ensure that the financial and viability implications of any such policy are fully considered.

A3: How should these actions be delivered and measured?

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

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?

Whilst in principle this approach is positive, any policy should incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met. The financial and viability implications of such a policy must also be considered both in meeting the individual policy requirements and cumulatively with other policy requirements to ensure the delivery of housing and other objectives is not compromised.

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?

The measures set out provide a broad framework for moving towards a net zero carbon future. It is noted that the policy theme 3 includes the following, 'This effectively means that the zero carbon 'rating' of all new development should be achieved on-site through the fabric of the buildings (energy efficiency), plot orientation, plus the incorporation of renewable energy generation.'

3.3.3. It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

3.3.4. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

3.3.5. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.) Carbon neutral means that while some emissions are still

being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.

3.3.7. Any policy wording should therefore target 1) a stepped approach and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

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?

It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

3.3.9. Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

3.3.10. Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)

3.3.11. Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.

3.3.12. Any policy wording should therefore target 1) a stepped approach and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

A requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Any policy wording should target 1) a stepped approach and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero.

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

It is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved. The targets should be referenced and refer to the fact that these 'could', for example, be achieved by including certain on or off-site types of renewable energy.

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?

It is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved and should not set targets for the production and use of renewable energy.

3.3.19 Furthermore, assuming the primary aim of any policy is about achieving a reduction in energy use and in particular carbon reduction, the policy should firstly promote a reduction in the actual energy use, through a fabric first' (or energy efficiency in the design of buildings) approach. Any policy which focuses on targets for the production and use of renewable energy could conflict with the overall aim of energy reduction, by placing more weight on achieving a target around the production and use of energy rather than an actual reduction in energy consumption.

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?

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?

The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.

3.3.21 Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Devizes. The Emerging Strategy must allow for growth around Devizes in order for the objectives around sustainability and climate change to be delivered.

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?

The practical policy steps could include the following:

- Greater emphasis on the importance of providing attractive walking and cycling routes within new development sites and connecting developments to local services and facilities; and
- Requiring new developments to provide an appropriate level of infrastructure for electric vehicles.

3.3.23 The proposed development on the SMV land could deliver on both of these steps. The SMV land provides an excellent benefit, due to its direct connection to Quakers Walk enabling easy and attractive pedestrian and cycling access to Devizes town centre. This is a really positive benefit that other potential alternative sites in Devizes being considered by the Council do not offer.

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?

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?

Any policy wording should target 1) a stepped approach towards being 'net carbon neutral' by 2030 and 2) ensure any planning policy also has a target of being 'net carbon neutral' (not zero carbon) by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero.

3.3.25 A more flexible approach will help ensure that the energy reduction requirements do not negatively impact on the design and viability of schemes to the same extent. However, further evidence is required to enable the energy requirements to be considered cumulatively with other requirements to ensure housing delivery and other objectives are not compromised.

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

Rep ID: Climate133

Consultee code: Other

Consultee Organisation (if applicable): Wiltshire Council Housing Enabling team

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Any requirements for specific design, mitigation measures, or standards above the minimum building regulations requirements should be considered as part of the Viability Assessment of policies so that any potential impact on the delivery of Affordable

Housing can be considered. Any impact of such measures should result in a reduction of land value rather than a reduction in the delivery of the full policy requirement of Affordable Housing.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Please note that the response of Wiltshire Council's Housing Enabling Team relates to the delivery of Affordable Housing. A separate response will be submitted by the Council's Residential Development Team with respect to the Council's housing development programme.

Rep ID: Climate134	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
No - Not if the Local Plan allows changes of use for greenfield sites to allow residential development. It can only be done if the Local Plan prohibits changes of use for greenfield sites, so as to prevent urban spread, one of the major causes of carbon emissions increasing.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
In addition to prohibiting changes of use for greenfield sites (answer to QA1 above): <ul style="list-style-type: none"> • encouraging cycling, walking and car-reduction measures within all settlements 	

- ensuring that schools, medical centres and shops are all within walking distance (or short cycling distance able to be done by children) of all residents within the settlement
- ensuring that the current foot-print of towns is not extended
- encouraging the extension upwards of existing buildings (whether residential or other) in large towns for residential use
- allowing to be built (or compulsorily buying land and building) new multi-storey residential buildings in large towns, as necessary
- insisting on zero-carbon for all new construction
- encouraging eco-friendly and carbon-reducing farming practices in all greenfield areas
- encouraging retro-fitting to reduce carbon emissions from existing buildings

A3: How should these actions be delivered and measured?

Delivery is not the difficult issue. Accepted means of measuring carbon emissions should continue.

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

No.

Again, one of the most effective measures to successfully tackle flood risk and promote sustainable water management is to prohibit changes of use of greenfield land and encourage afforestation where appropriate, allowing the rainwater to drain gradually and naturally off that land. Expanding the urban footprint into greenfield sites will only exacerbate the flood risk problem.

Subject to that overriding consideration, the one measure set out in 'Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water' which must be avoided is the proposal that 'new built development should be located in Flood Zone 1 (flood resilient design methods or not).'

That is a recipe for having very unhappy occupants in future.

Many of the measures in Policy Theme 1 are introduced by 'Where technically feasible'. This should be defined to mean 'unless impossible' and should not be able to be used as a fig-leaf for non-enforcement.

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?

No.

Our 'natural capital' will be destroyed (not enhanced) if and wherever development occurs on green-belt land. Bio-diversity suffers a net loss if and wherever houses are built on green-belt land and people inhabit them. GBI may mean that the development destroys our 'natural capital' a little bit less obviously than without GBI, but it certainly won't enhance our 'natural capital'.

This consultation paper itself recognises this, in acknowledging at the outset:

"Through burning fossil fuels and changing land use, human activity has quickly become the leading cause of climate change" (my underlining).

It is recognised by the Global Warming and Climate Emergency Scrutiny Task Group set up by Wiltshire Council's Environment Select Committee referred to at paras 3.5 to 3.7 of this consultation paper that "protecting the natural environment, ecology and ecosystem services" is vital.

By continuing to allow changes of use of greenfield land to housing land, you will fail to confront the awkward truth you state: "through [inter alia] changing land use, human activity [is] the leading cause of climate change". Changing land use to houses is doubly harmful. It not only destroys the immediate natural environment represented by the lost land converted to housing itself, but it also impacts adversely on the habitat in the surrounding locality as a result of the imported human footfall which together with the associated polluting effect – e.g. increased carbon emission, waste, noise, air quality and light pollution – destroys the diversity of the wildlife in that locality.

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?

Yes. I support the proposals in Policy Theme 3.

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?

Yes, it is well achievable by then, if not before. There is considerable and continuing pressure on the Government to tighten Part L of the First Schedule to the Building Regulations 2010 to ensure that no homes now being built are built to a non-zero-carbon standard only to require retro-fitting in a few years' time to make them zero-carbon.

It is open now to the Council to use Section 70(1)(a) of the Town and Country Planning Act 1990 to impose "such conditions as they think fit" to any planning permission that they grant, and Para 55 of the National Planning Policy Framework allows conditions to be imposed where they are "necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects".

Obtaining zero-carbon homes as soon as possible is a universal goal precisely because it is "necessary" – and not merely necessary but urgently necessary. So for new homes, it is undoubtedly both "necessary" and "reasonable". I am aware of one case already where a planning application for a new residential building has already been granted by Wiltshire Council subject to the condition that it is built to a zero-carbon standard. There is no reason that I can see why the Council should not adopt that as a condition for all new-builds.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Although it would make new builds a bit more expensive, there is no reason why that should be allowed to affect viability.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

To demonstrate that the Council is taking seriously the objective of reducing carbon omissions set out in the opening paragraph 1 of this consultation paper, it should not rely on current Building Regulations (which are 11 years out of date) nor on the Government's proposed 'New Homes Standards' but insist on zero-carbon for all new buildings, as suggested by many of the

respondents to the 'Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings Summary of responses received' (see paragraph 3.8).
The technology is there and should be used.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This, I believe, will be government-led. It will no doubt come to be seen to be unacceptable for existing homes to be significant carbon emitters, once all new buildings are required to be built to a "zero carbon" standard. I would imagine that legislation is then likely to follow to address these issues in existing homes. Until then, there is nothing to prevent the Council from encouraging the retrofitting and modernisation of existing buildings.

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?

From what little I know about it, I think the measures outlined in Policy Theme 4 go far enough.

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

All technologies, subject to ensuring that its environmental impacts (direct, indirect and cumulative) are or can be made acceptable.

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?

No strong view

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?

See answer to B7 above in general.

Incorporation zero-carbon technology into listed buildings ought not to be insuperable although it will require input from English Heritage. Solar panels for example could, I suggest, be installed on hidden roofs of listed properties provided the fabric was not damaged.

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?

I agree with the measures summarised, but don't know enough to say if they will be sufficient

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?

I've no insights on this.

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?

Again, I can't help.

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?

It would force those designing developments to ensure that zero carbon living in energy production and consumption terms was an integral part of each scheme and not just a voluntary extra

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

Thank you for the paper - and I hope my comments are helpful

Rep ID: Climate135	
Consultee code: Other	Consultee Organisation (if applicable): Salisbury Greenspace Partnership
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate135a, Climate135b
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?	
Only if significantly modified & if the current crises – climate change, biodiversity loss & public health are considered together because they are inextricably linked	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
The county's GBI Strategy needs to be published in full. This strategy has been outstanding for over a decade and urgently needs to be given priority in the LPR and should be given a significantly higher profile in policy making across all Wiltshire	

Council departments in the face of the emergencies arising from climate change, the loss of biological diversity and the global pandemic as well as threats to public health from all manner of pollution.

Regrettably, the lack of this publication has meant that many opportunities have been missed to raise awareness of the value and importance of land & water bodies eg. rivers in delivering natural capital ie. the essential ecosystem services needed to balance and mitigate the effects of climate change, the loss of biodiversity locally and support health and wellbeing.

These services include temperature regulation, provision of shade and shelter, carbon capture/sequestration, biodiverse wildlife habitat and pollination services, connectivity for wildlife and people (green routes for active travel), amenity, landscape setting, recreation and educational resources, maintenance of local distinctiveness, help in maintaining good air and water quality, supporting soil health, food production and natural flood management by absorbing water run-off, providing water filtration, nutrient management etc etc.

Effective networks of multifunctional GBI which are well-designed, planned and managed should have been established, especially in Wiltshire's principal settlements and market towns years ago, but this is taking too long to happen.

These issues have recently been highlighted by Professor Dasgupta in the recently published landmark review, *The Economics of Biodiversity*, February 2021 which was commissioned by the Treasury. He states that, 'Our economies, livelihoods and wellbeing all depend on our most precious asset: nature' and goes on to say that it is vital that countries across the world factor natural capital and the value of nature into accounting and policymaking at every level.

There is an urgent need for Wiltshire Council to plan, manage & maintain their own land holdings across the county in the public realm and on the county farms, in order to optimise ecosystem service delivery & with the current crises in mind.

SAGP also consider it essential that the current crises are not considered in isolation. They are inextricably linked and it is imperative that Wiltshire Council addresses them as such.

Salisbury Area Greenspace Partnership has developed proposals for a local GBI strategy which we would like to see incorporated into the LPR settlement profile for Salisbury - see plan entitled, 'Working towards a GBI Strategy for the Salisbury Area' attached & the accompanying Notes.

Salisbury is one of Wiltshire's three principal settlements (population approx. 44,000) and the main service centre for southeast Wiltshire. It has a high-quality landscape setting, an internationally important chalk river system flowing through the city & local area, a world class cathedral and a number of other important historic features. It has grown rapidly in recent years with large housing estates around its periphery and is now facing predictable consequences in the absence of an effective GBI network.

Retrofitting such infrastructure will have its challenges both in practical & financial terms but in the face of the current crises and the very short period of time we have in which to deal with them, achieving such a network is becoming even more urgent.

SAGP's local strategy plan illustrates how an effective, multifunctional, high quality GBI could be established which optimises ecosystem service delivery. We want local residents and policy makers to understand and recognise that the local GBI, ie. the

landscape and rivers provide the community's natural capital which it depends on for resilience and economic viability going forward.

A3: How should these actions be delivered and measured?

This community generated plan identifies and highlights the need to safeguard and significantly enhance the biodiversity of key areas of the river valleys and the surrounding downland in order to optimise the delivery of the ecosystem services referred to above and support the local distinctiveness of the city & the surrounding smaller settlements. It also illustrates how a comprehensive network of linear walking and cycling routes or greenways (ie. planted where possible) could be achieved. These would connect up local green and blue spaces, improve community cohesion and accessibility, not only within the urban area but with the open countryside and surrounding neighbouring settlements. Wiltshire Council's Countryside Access Improvement Plan advocated this approach, and it is regrettable that the plan has disappeared from recent strategic thinking about transport and movement (LTP4?). SAGP also consider there is an urgent need for a well-considered tree and planting strategy for Salisbury to ensure that the character of its high-quality landscape setting is maintained and enhanced. The LPR low growth strategy with a focus on brownfield sites is to be welcomed and it is important that the Salisbury Area Greenspace Partnership plan, 'Working towards a GBI Strategy for the Salisbury Area' which illustrates the potential for safeguarding and enhancing local GBI, is acknowledged by Wiltshire Council policy makers and is included into the Local Plan's settlement profile for the city.

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

See answer to Q A2 above

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?

See answer to Q A2 above

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?

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?

N/A – this question & through to the end of this document

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate136	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Sedgehill and Semley Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The ever-increasing reductions in carbon emissions already being made in the areas of energy generation (e.g. use of solar, wind and non-fossil fuels), energy storage and management (to spread consumption load more evenly across 24 hours) and reduced energy consumption (through improved building standards and reduced vehicle emissions), should continue year on year through to 2030 and beyond and result in significantly lower carbon emissions by 2030. However, as noted in the draft plan, the challenge will be to ensure that Wiltshire achieves a net zero position by 2030. Unfortunately, many factors associated with reducing carbon emissions are outside the control of Wiltshire Council. These include:</p> <ul style="list-style-type: none"> • the progress of decarbonising transportation that is progressing well with electrification of private cars and light commercial vehicles, but is less well developed for heavy goods vehicles and rail unless bio-fuels (for which there are also environmental concerns) are implemented on a widespread basis; 	

- the development of nationally agreed “green” building standards that will be required before buyers and architects embrace fully low carbon designs, large manufacturers develop and certify more affordable energy efficient materials, builders embrace more energy efficient construction methods, financial institutions provide funding for construction and insurers underwrite the design, materials and construction methods; and
- there are nationally agreed standards to report / monitor / assess carbon emissions and absorption across such that counties like Wiltshire can use status and trend data at community, area and County level, to monitor, assess and manage carbon emissions, report progress and support landuse and planning decisions.

Wiltshire Council must therefore focus on those factors that it can influence and control between now and 2030 and beyond to ensure that it takes advantage of progress at the national level. Carbon emission data from rural communities, including that associated with farming, small industrial sites and tourism, will need to be collected by authorised authorities that are funded at county and national level; these communities will require national direction, plans and funding to realise any adjustments required to meet the 2030 goals.

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

The successful implementation of climate change policies will require the following:

- Strong leadership within Wiltshire Council and cross-departmental commitments to the policies;
- Nationally accredited or recognised procedures and technologies to report / monitor / assess carbon emissions and absorption across the County to provide the necessary status and trend data at community, area and County level, to manage carbon emissions, report progress and support land-use and planning decisions.
- Use of tools such as SCATTER to create a baseline of carbon emissions and conduct trade studies between carbon reduction options As noted in the draft plan, the predominate sources are Buildings (53%), Transport (40%) Agriculture and Land Use (4%) and Waste (3%). Accordingly, the Local Plan should also:
- Encourage modernisation of existing residential and non-residential buildings, especially older buildings in rural communities, to reduce their carbon footprint;
- Plan new housing and commercial development only where there is a real need and ensure it is built to zero carbon and sustainable standards, avoiding greenfield sites wherever possible;
- Plan “dispersed development” in local towns and discourage new large developments that require people in rural areas to travel long distances for work or leisure activities;

- Improve infrastructure for electric vehicles, including charging points in towns and community facilities, so they become the vehicles of choice for those living in rural areas;
- Improve public transport and encourage ride-share schemes in rural areas to provide access to local large towns and railway stations (especially Tisbury, Gillingham (Dorset) and Warminster for longer journeys across the County and further afield);
- Ensure major road schemes to relieve congestion and associated emissions, especially from HGVs, are based on local, regional and national needs and realistic projections of traffic volumes taking into account climate change policies and changes in work patterns due to COVID-19;
- Encourage service improvements to/from Tisbury, Gillingham (Dorset) and Warminster rail stations
- Include renewable energy generation, energy management and energy consumption in planning policies, while ensuring no adverse impact to rural areas especially AONB (including light pollution) and protected sites
- Protect existing and improve the carbon absorption capabilities of the natural environment, through planning and land-use policies for rural areas that should also improve biodiversity;
- Protect and improve agricultural land, especially on the Council's own farms, to improve carbon absorption and bio-diversity, whilst ensuring local food production and future food security;
- Investigate the potential for small, medium and large scale production of bio-gas from organic waste to reduce the amounts of methane released into the atmosphere and reduce consumption of fossil fuels; and
- Ensure planning policies require a climate change impact assessment for proposed developments.
- Force (with incentives) new private, public and commercial buildings to include ecological electric generating features, such as solar roofing tiles and wind (and suitable storage).

A3: How should these actions be delivered and measured?

Strong leadership within Wiltshire Council and cross-departmental commitments to the policies:

- Establish a cabinet level responsible person for climate change and bio-diversity;
- Issue annual reports on progress / status Procedures and technologies to report / monitor / assess carbon emissions and absorption across the County to provide the necessary status and trend data at community, area and County level, to manage carbon emissions, report progress and undertake trade studies to support land-use and planning decisions:
- Work with national government, agencies and other councils to identify most appropriate solutions, such as developments of SCATTER, and then monitor implementation and outcomes. Encourage modernisation of existing residential and non-residential buildings, especially older buildings in rural communities, to reduce their carbon footprint:

- Work with national government and institutions to provide attractive financing for improvements;
- Communicate opportunities to access funding to property occupants / owners; and
- Monitor uptake and completions.

Plan new housing and commercial development only where there is a real need and ensure it is built to zero carbon and sustainable standards, avoiding greenfield sites wherever possible:

- Update building planning policies and utilise existing planning procedures
- Ensure standards are met via Building Control procedures.

Plan “dispersed development” in local towns and discourage large developments that require people in rural areas to travel long distances for work or leisure activities:

- Update planning policies
- Utilise existing planning procedures. Improve infrastructure for electric vehicles, including rapid charging points in towns and community facilities, so they become the vehicles of choice for those living in rural areas:
- Make charging infrastructure improvements a condition of planning approval for all developments;
- Introduce a levy for large developments, based on CIL, to provide necessary charging infrastructure at the development site or in the locality;
- Introduce a levy for smaller developments, based on CIL, that when added together can provide funding for the installation of charging infrastructure in the locality of those developments. Improve public transport and encourage ride-share schemes in rural areas to provide access to local large towns and railway stations (especially Tisbury, Gillingham (Dorset) and Warminster for longer journeys across the County and further afield:
- Work with bus, coach and train operating companies to coordinate time-tables;
- Investigate potential for young adults (over school age) in rural areas to use school buses to travel to/from places of employment;
- Investigate and encourage use of ride-share “apps” in rural areas, and
- Obtain feedback from bus, coach and train operators and ride-share businesses. Ensure major road schemes to relieve congestion and associated emissions, especially from HGVs, are based on local, regional and national needs and realistic projections of traffic volumes taking into account climate change policies and changes in work patterns due to COVID-19;
- Update transport planning policies; and
- Utilise existing planning procedures. Encourage service improvements to/from Tisbury, Gillingham (Dorset) and Warminster rail stations
- Work with train operating companies to coordinate timetables with bus companies; and
- Obtain feedback from train operators. Include renewable energy generation, energy management and energy consumption in planning policies, while ensuring no adverse impact to rural areas especially AONB and protected sites.

- Update building planning policies; and
- Utilise existing planning procedures.

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

Protect existing and improve the carbon absorption capabilities of the natural environment, through planning and land-use policies for rural areas that should also improve biodiversity;

- Update Land-Use policies; and
- Utilise existing planning procedures. Protect and improve agricultural land, especially on the Council's own farms, to improve carbon absorption and bio-diversity, whilst ensuring local food production and future food security; and
- Update Land-Use policies; and
- Utilise existing planning procedures. Investigate the potential for small, medium and large-scale production of bio-gas from organic waste to reduce the amounts of methane released into the atmosphere and reduce consumption of fossil fuels:
- Work with national government, research agencies and bio-gas technology developers to understand the potential for the technology; and
- If appropriate, include the technology in the portfolio of options available to reduce emissions

Ensure planning policies require a climate change impact assessment for proposed developments.

- Update planning policies; and
- Utilise existing planning procedures, amended to include climate change risk assessment.

No. There needs to be greater focus on water management in rural areas that can significantly reduce the risk of flooding in the local area as well as in existing and planned developments down-stream. Managing water catchment areas and run-off by re-establishing wetlands and ponds for water storage during heavy rainfall will reduce the flow of water to vulnerable locations down-stream while digging out filled in / blocked drainage ditches, maintaining existing ditches, will reduce localised flooding of fields (with associated damage to crops and grass land) and flooding of minor but important roads and rights of way in the immediate area. Such measures will also improve bio-diversity by encouraging new plants, animals and birds in the wetlands, ponds and ditches. Much of the above can be accommodated within existing landuse policies working with the land-owners and users (e.g. tenant farmers) to achieve outcomes beneficial to the land owner, tenants and the wider community. Parish Councils, knowledgeable of their local areas, should play a major role in developing and implementing local water management plans with

other community stakeholders. New off-road driveways and parking requirements must be scrutinised thoroughly so that water flow and chemical/ biological content is effectively measured, managed and controlled.

There are also multiple opportunities for businesses and private households to utilise stored rainwater instead of mains water in rural areas and many rural properties still rely on septic tanks for sewage treatment. Sustainable water management should therefore be considered when considering planning applications for all new developments as well as substantial changes to existing developments.

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?

As noted in the plan, using green space and the water environment can improve carbon absorption and air quality, provide passive cooling for buildings, also provide significant benefits to people's well-being and quality of life as well as the ecosystem including enhancing bio-diversity. From a rural community perspective, green space and water environments need to be managed to ensure carbon reduction and/or absorption initiatives do not adversely impact the very nature of the environment that rural communities cherish. Consequence management models need to be produced to assess and mitigate all potential outcomes to changes that are made and / or measures introduced. Parish Councils, knowledgeable of their local areas, should play a major role in developing and implementing local green / blue infrastructure management plans with other community stakeholders.

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?

The measures proposed for all new developments including net zero carbon design, minimising net construction waste and be supported by a sustainability statement should also be implemented for other developments involving significant additions to site and building floor areas. If new, substantial or smaller decarbonising developments (such as solar panels) are planned in rural areas, then they must be designed so as to not adversely impact the nature of the environment that rural communities cherish.

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?

Sedgehill and Semley Parish Council is not qualified to answer this question. However, the Local Plan has achievable targets that can be met in realistic timeframes such that it has credibility and enables all stakeholders to plan accordingly. Rural councils would benefit from free ecological and sustainability training so that new planning requests can be considered in an informed manner.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

The viability of development schemes is already dependant on multiple factors and requiring them to be zero carbon will be another consideration for the developers. However, the long-term benefits of zero carbon developments in terms of reduced energy costs and greater sustainability for owners, tenants and users should outweigh any costs associated with increased construction costs (e.g. mortgage, loan repayments, rates etc.) and therefore be attractive to prospective buyers, tenants and users. The Government could consider providing more ecological incentives/discounts to (eco) product manufacturers, developers and builders.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should aim to implement national standards and regulations (Incentivised). Nationally agreed “green” building standards will be required before buyers and architects embrace fully low carbon designs; large manufacturers invest in, develop and certify more affordable energy efficient materials; builders invest in and use more energy efficient construction methods; financial institutions provide funding for construction; insurers underwrite the design, materials and construction methods; and buyers have confidence to buy.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Owners, tenants and users will benefit from reduced energy costs associated with modernised buildings, but may not be able to afford the initial high capital costs associated with zero carbon power generation equipment, insulation and glazing, and installation and commissioning thereof. Noting the anticipated squeeze on public finances and expenditure over the medium term, the Council should use its buying power and investigate, with other councils if beneficial, what commercial arrangements are available from equipment manufacturers, installation companies and financial institutions to spread the up-front costs of building modernisation over a number of years with monthly payments similar to the anticipated monthly savings on energy costs.

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?

Sedgehill and Semley Parish Council is not qualified to answer this question. If all roof coverings (tiles, glass, metal, wood and plastic, etc) were designed to manufacture electricity/heat from solar, the reduction in need for carbon produced power would be massive. Add small, attractive wind power capturing solutions and the need for huge, centralised power plants will be reduced.

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

Improved zero carbon power generation, power storage and management, energy saving, and energy recovery systems are being developed by multiple companies for a wide range of industries with readacross to domestic and business use. It is therefore very difficult to predict what particular technologies will be the best suited for applications ranging in size and complexity from small domestic to large industrial use. Accordingly, the Council should not favour a particular technology, but encourage the development of

a variety of affordable and sustainable green energy technologies. Competition should be encouraged to achieve fair pricing and success reinforced.

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?

In principle, yes, with the setting of achievable targets and associated timelines. However, Sedgehill and Semley Parish Council is not qualified to propose what these should be. Measurement of production and use of renewable energy can be facilitated by automated monitoring of systems and recording of data that can subsequently be provided to the Council. Accurate metrics based on urban, semi-urban and rural settings will provide opportunities to adjust the investment to the most efficient producers by day, night, weather, season, etc.

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?

Retrofitting existing residential and non-residential buildings will provide the greatest benefit due to the numbers of ageing poorly insulated properties using fossil fuels. Power distribution, energy management and energy saving technologies can be incorporated (with appropriate care and attention) in all types of buildings including those listed and in sensitive areas. Zero carbon power generation such as solar panels can be installed on many buildings, or on the ground. However, external equipment and systems must be designed and /or located so as to not adversely impact (visually or audibly) the nature of the environment that rural communities cherish. Run innovation competitions between Science and Research companies to, for example, redesign roof slates so that they retain their appearance, but produce heating or power and/or reduce heat loss. Ground-source energy generation should also be considered, but planners and installers will need to take into account surface vegetation, soil types, conditions and water courses to ensure no adverse impact to the environment.

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?

Air quality issues are usually associated with urban and city environments with high population densities and/or industrial areas. However, air quality issues can arise in rural areas due to emissions from businesses, light industry and farming. If the emissions relate to decomposition of organic waste, then the opportunity to create bio-gas that can be used for heating and/or power generation depending on scale, should be encouraged. An air quality risk assessment should be included in all planning applications where planned or accidental emissions could affect local air quality. Parish Councils, knowledgeable of their local areas, should play a major role in evaluating the risk assessments with other community stakeholders. No new properties or premises should be allowed to have open fires or woodburning stoves. A financially beneficial woodburner scrappage scheme could be introduced.

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?

It will be easier to achieve the required modal shift to public and active transport in populous areas such as larger towns and cities where there is greater demand and shorter travel distances from homes to work and amenities. In contrast, there is less demand in sparsely populated rural areas, such as Sedgehill and Semley, but greater distances to travel to local towns to access work and local amenities for health and well-being, shopping, financial, education and leisure facilities. However, there are opportunities to encourage modal shift in rural areas by creating affordable and accessible options to the use of private cars. The Local Plan should include steps to improve public transport in rural areas and encourage rideshare schemes to provide access to local large towns (in our case Shaftesbury and Gillingham) and railway stations (especially Tisbury, Gillingham (Dorset) and Warminster for longer journeys across the County and further afield. Specifically, the council should work with train operating companies, bus and coach companies to coordinate rural time-tables especially for travel during the early morning and evenings (for young and disadvantaged people getting to/from work and education) where it is currently lacking; investigate the potential for young adults (over school age) in rural areas to use school buses to travel to/from places of employment; and investigate and encourage use of ride-sharing in rural areas through the development of “apps” where people can coordinate travel plans and share vehicles. Speeding up the transition to greener fuelled vehicles including cars, motor-cycles, scooters and bikes, especially

electric, will require improvements and changes to infrastructure so they become the vehicles of choice for those living and working in rural areas. Electric vehicles should have sufficient performance to travel from even remote rural areas to major towns, and home owners and large businesses in rural areas should have charging points at their homes and businesses. The required changes to infrastructure should therefore include installing charging points in towns and cities; giving green vehicles better access to towns and city centres / parking spaces; introducing car park charging policies that favour green vehicles; and encouraging the use of e-scooters and e-bikes in rural areas instead of larger vehicles that use more energy. The costs of these improvements can be met by making charging infrastructure improvements a condition of planning approval for all property developments; introducing a levy for large developments, based on CIL, to provide necessary charging infrastructure at the development site or in the locality; and introducing a levy for smaller developments, based on CIL, that when added together can provide funding for the installation of charging infrastructure in the locality of those developments.

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?

In addition to encouraging and incentivising households and business's to use their own power generation, storage and management systems to power electric vehicle charging points to avoid drawing power from the national distribution network, the Council should explore opportunities for local domestic and business power generation, storage and management systems to be integrated with local distribution networks. Both measures will help smooth peaks and troughs in the total demand from households, businesses, industry and transportation etc. for electrical power across 24hr / 7 day / 365 day periods. In rural areas, power generation options include solar power, wind power and potentially the use of bio-gas produced from organic waste to power combustion engine powered electrical generators. However, these solutions must be designed so as to not adversely impact (visually or audibly) the environment that rural communities cherish. Local power distributors need to be able to extract spare generated electricity, store it and provide it during peak power, high-demand periods. That said, the Government must resolve this national resilience need.

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?

The viability of development schemes is already dependant on multiple factors and requiring them to be zero carbon will be another consideration for the developers. However, the long-term benefits of zero carbon developments in terms of reduced energy costs and greater sustainability for owners, tenants and users should outweigh any costs associated with increased construction costs (e.g. mortgage, loan repayments, rates etc.) and therefore be attractive to prospective buyers, tenants and users. The demand for carbon neutral energy production will be huge; the Government needs to offer incentives to fossil fuel energy producers to diversify and change to eco-friendly measures.

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

Rural communities will continue to have a lower carbon footprint and more bio-diverse environment than densely populated areas. The nature of land usage (agriculture, woodland, common, wetland, and military) already results in carbon absorption rates (per square mile) much higher than in towns and cities and low population densities, agricultural and limited industrial use result in lower carbon generation (per square mile) compared with towns and cities. By implementing carbon zero technologies, rural communities can further improve their contribution to a net zero carbon environment across the county. In order to energise rural areas, such as Sedgehill and Semley, community empowering and bonding workshops on Climate Change and the importance of growing bio-diversity should be staged, particularly to build on the social bounce back and community rebuilding after COVID. Every citizen has their part to play in repairing the planet for our children and future generations to enjoy and prosper. Our intelligence has put us at the top of the food chain; now is the time to use that intelligence to re-balance our impact on the planet, its climate, environments, ecosystems and biodiversity. Get this right and we should assure our survival in careful cooperation with the flora and fauna that supports our food chain. Wiltshire County should work closely with Parish Councils who have the knowledge and understanding of their local environments to ensure that rural land use policies not only deliver net zero carbon modernisation and development, better water management and improved bio-diversity but continue to improve the fabric of the countryside that is vital to community vitality, health and well-being. Specifically, Wiltshire Council should create a “Rural Communities Climate Change and Bio-Diversity Working Group” that can work with the Parish Councils and other stakeholders to ensure that there is a balanced approach across rural and urban areas to meeting the climate change and bio-diversity challenges. The parish of Sedgehill and Semley is in south west Wiltshire with the nearest towns being Shaftesbury and Gillingham in Dorset. Other rural communities in Wiltshire will be in a similar situation where, although they are in Wiltshire, the nearest towns with substantial amenities may be in adjacent counties. Wiltshire Council should therefore cooperate (cross border planning) with adjacent

counties especially with regard to low carbon transportation and electrical vehicle infrastructure planning. Accurate monitoring and/or assessment of carbon emissions and absorption rates across the County will be required to ensure annual reports are accurate and credible so that resources can be focussed on resolving the worst performing environmental emissions. The Council should investigate the use of emerging technologies such as fixed and mobile emission / air quality monitoring systems and airborne / satellite-based earth observation capabilities to accurately determine land use and associated carbon absorption rates. Outside of just reducing the energy we use, clean energy storage and efficient distribution and use in the worst peak surge times are the most important aspects of reducing our impact on climate.

Rep ID: Climate137	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): David Jarvis Associates
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Catesby Estates PLC	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Catesby Estates believe that, with regard to meeting housing requirements, the most effective way of achieving climate-change targets is to allocate large strategic urban extensions at the main settlements. This ensures that such developments can embed carbon-reduction measures efficiently and at a significant scale, by incorporating measures on-site but also through additions to existing infrastructure. This will help to foster sustainable communities containing significant energy efficiencies within housing, transport infrastructure and through the incorporation of sustainable drainage strategies and biodiversity enhancements.	

As and when such sites come forward, the Council should look to engage with developers at the outset in terms of what they will seek in terms of carbon reduction measures; this will ensure that such measures can be costed at an early stage and assessed with regard to viability so they can be incorporated within schemes from the start.

A3: How should these actions be delivered and measured?

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

Yes. Catesby Estates are promoting land to the east of Melksham for a large strategic urban extension; if allocated, development would incorporate sustainable drainage methods within the Masterplan from the outset; all built development will be restricted to Flood Zone 1 land.

Areas of the site along Clackers Brook lie within Flood Zone 3; this area would remain undeveloped and retained/enhanced as part of the on-site green/blue infrastructure provision, incorporating biodiversity improvements as part of the wider Green Infrastructure corridor.

As a strategic urban extension adjoining Melksham, this site is well-located to feed into this existing green/blue infrastructure and provide significant improvements that would be maintained in the long-term as part of the overall neighbourhood management.

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?

In Catesby Estates' experience, it is much more efficient and effective to provide biodiversity net-gain measures as part of large strategic extensions. Such developments can deliver tangible benefits at a significant scale with strong connectivity; this is much more difficult to achieve with a number of smaller, disparate sites. Therefore, the allocation of large strategic sites will be a vital tool in helping to deliver biodiversity enhancements.

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?

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?

Catesby Estates support such a target in principle; in practice, it is likely to take longer to achieve zero-carbon on developments. Due to economies of scale, this could be easier to achieve on large-scale strategic extensions, subject to the impact on viability.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Not necessarily. Catesby Estates fully supports Council's view that large-scale strategic developments can accommodate climate-change and biodiversity benefits to a more efficient and productive extent than small sites, subject to viability. However, the key for developers is for the Council and key stakeholders to be clear from an early stage precisely what they will require from developments in terms of renewables, biodiversity improvements, building design etc so that this can be incorporated into the overall Masterplan phasing, design and assessed in viability terms from the outset to ensure deliverability as schemes progress.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The Council should be guided by latest Building Regulations as this would be the required standard for new developments; Building Regulation standards are constantly adapting to new technology, including with regard to energy-efficiency, so this would seem the most appropriate method to follow.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

Catesby Estates supports the provision of renewable energy schemes as an intrinsic part of developments in order to maximise energy efficiency and reduce carbon. If the Council is considering setting targets for renewable energy production within developments, it should be made clear that this will need to be subject to viability assessment on a site-by-site basis.

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?

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?

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?

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?

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?

As highlighted in the answer to Question B5 above, provided such requirements are raised at an early stage in site promotion/development, this can be assessed as part of the overall Masterplan in terms of design and viability.

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

Rep ID: Climate138	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
<p>I support the need to address climate change and to reduce net carbon emissions in line with the Government's targets. I support developments such as renewable energy, and integrated public transport and active/battery assisted travel. However, the proposed local plan does not reduce net carbon emissions. To do so it needs to:</p> <ul style="list-style-type: none"> • Develop a sustainable plan that reduces current out commuting by taking an employment led approach – providing work for those who currently live in the Chippenham area. 	

- Reduce housing numbers to what is needed and avoid the significant harm to the environment by building huge urban expansions with substantial road infrastructure
- Measure the carbon emissions of the site options and give priority to those sites that minimise current and future emissions.

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate139

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

I am particularly concerned about the impact of insufficiently thoughtful development on the two challenges of the climate emergency and the biodiversity losses we now face – so severe that it has been termed The 6th Extinction. However, the effect of the wrong development choices also impact simple well-being and human needs. I understand that the present plans add an additional 5,000 homes to the amount assessed as necessary – that many are on green-field sites, or far from public and/or active transport – that there has been no provision for on-shore wind farms (the cheapest form of alternative energy) – and that there has been little provision for low-carbon housing design, let alone passiv house design.

I understand that the plan has included a so-called ‘distributor road’ in Chippenham that would render large areas of environmentally valuable land unviable, and has been unanimously rejected by Chippenham’s Planning, Environment and Transport Committee. This is the kind of project that would have a hugely damaging carbon and environmental effect for the county – and the country – as a whole.

Please consider how these plans negate your own stated goals.

It’s two years now since Wiltshire declared a Climate Emergency – you then set goals that cannot be achieved unless the short-term targets lead in that direction. Yet the green economy holds out real prizes for visionary thinking!

A recent Guardian article points out that while smart, low-carbon homes were once the preserve of one-off grand designs – now there are 30,000 projects in the pipeline. Why can’t Wiltshire be one of these? Apparently, Exeter council has been building zero-carbon homes for the last decade – with more than 200 council houses built so far to the Passivhaus low-energy standard, and 1,000 more in the pipeline. Why can’t we do this?? <https://www.theguardian.com/artanddesign/2021/mar/06/eco-homes-become-hot-property-in-uks-zero-carbon-paradigm-shift>

Intelligent design of our living spaces could transform our lives – and help secure our future. Give us housing development where there is genuine, current need, with easy, available public transport, augmented by cycling and walking infrastructure.

Reassess road schemes, remembering how our work-patterns have changed, post-covid, and give us more trees! - remembering how trees off-set the health effects of present pollution, even as they help sequester carbon – and above all, look for every possibility to improve biodiversity, protecting the best and most versatile agricultural lands.

You’ve made new promises to us – we are relying on you to keep them.

Rep ID: Climate140	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Tetra Tech (formerly WYG)
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Stonewater	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>The SCATTER evidence provided within Section 3 of the consultation document is useful in starting to identify the main sources of carbon emission within Wiltshire. However, there is limited evidence provided to show what the potential impacts of particular carbon reduction techniques could be. For example, if all new homes built were to be designed to be carbon neutral, what effect would this have in reducing overall carbon emissions when assessed together with the existing housing stock? What would be the effect of continuing the current spatial strategy or moving to an alternative spatial distribution of growth on transport patterns given that this is identified as the single biggest contributor to carbon emissions?</p> <p>With only base carbon emissions analysed, it is not possible to say whether emerging land use policies are able to deliver outcomes that significantly reverse existing carbon trends before 2030. This will only become clear as potential growth scenarios are tested through Strategic Environmental Assessment and the fundamental principles of sustainable development (as defined in the NPPF) are weighed up and shown to be delivered through the emerging Plan.</p>	

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

As part of the above growth testing we would question whether the existing distribution of growth across Wiltshire is maximising the potential self-containment of some, lower tier settlements. In particular, some Large Villages already include an abundance of services and facilities including employment that would be able to support sustainable levels of growth and provide for most day to day activities, reducing residents' need to travel elsewhere.

The ability of higher order settlements (Main Settlements, Market Towns) to viably accommodate higher sustainability standards including design techniques and sustainable travel improvements should be tested. It may be that Large Villages are able to deliver greater sustainability measures due to higher land and residential values.

With the above in mind, the most practical and achievable step that planning can take to significantly reduce carbon emissions is to carefully consider the spatial pattern of growth and the viability of increasing climate change requirements on new development across the settlement hierarchy. We would expect all growth scenarios to result in policy provision that pro-actively supports development proposals which:

- include carbon neutral design and/or the retro-fitting of carbon neutral technology within existing buildings.
- Encourages the provision of local housing for local people, again promoting self-containment of existing settlements

A3: How should these actions be delivered and measured?

Policy objectives should be delivered through decision-making and measured within annual monitoring with the following potential targets:

- % of new homes built to zero carbon standards.
- No. of homes built with a local connection secured through S106

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

We generally agree with the measures under Policy Theme 1 (set out on page 15 of the consultation document) with the following comments to be considered:

- Attenuation of development run-off to Greenfield rates for the lifetime of development i.e. including for climate change rainfall predictions will inevitably improve flood risk compared to the undeveloped scenario where rainfall would continue to increase unattenuated. A 20% betterment on this should only be necessary in sensitive catchments where evidenced as such through the Council's SFRA.
- Not all developments will have the opportunity to "utilise and, where necessary create natural flood management measures – e.g. creation of wet woodland, building leaky dams, influencing arable farming methods." We suggest that this measure is amended to include reference to the SuDs hierarchy instead which offers a transparent means of securing the most sustainable drainage system on a site by site basis.

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?

We generally agree with the measures under Policy Theme 2 (set out on page 16 of the consultation document) with the following comments to be considered:

- We consider that the threshold of "all major development" – which we take to mean developments of 10 dwellings or more – for a green infrastructure audit is too low because it is only the strategic developments which are likely to be able to make a significant contribution to improvements. This measure could be amended to: "development schemes of over 30 dwellings, or any development proposal which has the potential to adversely impact upon existing GBI should be supported by an audit of existing GBI..."
- We would question whether maintenance should be required to be considered for a minimum of 30 years. Whichever timescale is used needs to be evidence-based.

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?

We generally agree with the measures under Policy Theme 3 (set out on page 16 of the consultation document) with the following comments to be considered:

- Requirements on new buildings to be zero carbon should be phased to take account of allocation and land purchases that have been planned or completed based on different (lower) design standards otherwise housing delivery and the Council's currently adopted growth targets could be compromised.
- Active support should be provided for within emerging policies for development proposals which exceed the required climate change design standards.

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?

No comment.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Achieving zero carbon development has implications for the orientation and layout of residential proposals which in turn need to be balanced against the NPPF and Council's objectives for the efficient use of land and high-quality design. In order for policies to be deliverable against these objectives we would expect there to be some flexibility within policies to allow the decision-maker to apply this balance taking into account the merits of the case.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

We consider that any performance standards should be based on nationally applied standards because this approach will ensure that market competition remains within Wiltshire. In a scenario where standards were to be vastly increased throughout Wiltshire alone, this could compromise housing delivery which is an important objective alongside climate change mitigation.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Proposals which include the retrofitting and modernisation of existing buildings should benefit from policy support.

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?

No comment.

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

No comment.

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?

No comment.

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?

No comment.

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?

No comment.

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 refer to our answer to Question A2.

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?

No comment.

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 refer to our answer to Question B5.

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

No further comments.

Rep ID: Climate141	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Sherston Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
It is reasonable to assume that but that is a very unambitious objective. The local plan should be mandating and insisting that carbon emissions are reduced significantly. The local plan needs to assist this reduction of carbon emissions in every way and as much as possible before 2030.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
1. Planning for new housing developments where there is genuine need, rather than being driven by out-dated, top-down targets;	

2. Avoiding building houses where this creates car dependency and people will need to commute long distances to their places of employment;
3. Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
4. Reassessing major road schemes based on realistic projections of future traffic volumes taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
5. Creating a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
6. Encouraging a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
7. Protecting and enhancing the carbon absorption properties of the natural environment (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
8. Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council's own County farms;
9. Introducing planning policies that require climate change impact assessment of all proposed developments, in advance, against the Council's carbon reduction targets.

A3: How should these actions be delivered and measured?

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

Unlikely - most flood risk is caused by existing water courses. There is a lack of regulation and enforcement on the upper reaches of rivers where poor land management is reducing the holding back of water in the water courses thus increasing flood risk further downstream. A recent example has occurred in the upper reaches of the Sherston Avon where a landowner has removed

significant numbers of trees in the river and flood plain without permission, which are all in a conservation area and the WC Planning Department appear to be reluctant to take any action. The EA have also washed their hands of it.

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?

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?

They are more likely to be effective if the aims are ambitious and reflect the seismic changes that are needed in energy generation, energy usage, transport, working patterns (e.g. more working from home).

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?

Why not? Passivhaus building standards have been around for 30 years. We already have the solutions for zero carbon transport; we need to position houses close to jobs and infrastructure or potentially create a new-town which has all those things (if the only alternative is to build on greenfield sites).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

If we stick to traditional methods of construction, there will be a price premium on new houses but there are other forms of pre-fabrication which are viable alternatives which could reduce prices.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Introducing planning policies that require housing and commercial development to be built to zero carbon standards in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible is essential. Ambitious plans to build to Passivhaus standards of building should be adopted with Solar PV, battery storage and heat pumps as standard.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The council need to lobby Government for incentives to encourage homeowners to insulate older properties (e.g. remove VAT on materials and labour), put in place a grant system that actually works (the current one has had low take-up).

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?

Onshore wind generation, battery storage at house or community level and micro-grids all need to be part of the solution. More pragmatism needs to be adopted in retrofitting Listed Buildings. The first priority is that they are capable of being inhabited in the 21st century in an affordable way using renewable energy. The second priority is then the retention of historic features.

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

It should encourage all renewable energy technologies and micro-grids.

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?

Wiltshire should be producing all its energy requirements from renewables by 2030.

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?

More pragmatism needs to be adopted in retrofitting Listed Buildings. The first priority is that they are capable of being inhabited in the 21st century in an affordable way using renewable energy. The second priority is then the retention of historic features. Sympathetic ways must be found to introduce double or secondary glazing, insulation and the ability to generate electricity.

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?

The self-containment policy may help as will theme to EVs or Hydrogen powered vehicles. However air quality is adversely affected by particulates from tyres and brakes so reducing traffic must also be priority. The air quality in Sherston is mainly affected by landowners/farmers/residents lighting fires and burning hazardous and toxic materials (E.g. plastics and rubber). Even wood smoke is known to be unhealthy. This practise needs to be banned, with recycling options pointed out to everyone.

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?

More street space in towns for walking and cycling with different modes to transport physically separate. More joined up cycle routes. More cycle racks in town centres. We just have to look at European cities (e.g. Copenhagen, Berlin, Amsterdam) to see how this is done.

The use of electric bikes will make longer routes more feasible for commuters and shoppers.

EV charging points in all carparks. Solutions to EV charging for residents with no off-road parking.

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?

The DNO/DSOs know this is coming. Wiltshire Council needs to have robust conversations requiring them to support the rapid take-up for EVs and to allow significant local renewable energy generation. They should also be lobbying for legislation to allow micro-grids.

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?

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

This form is not user friendly!! I'm using an Apple Mac with Pages to complete this; I'm not alone in using Apple; the formatting is not helpful as the comment boxes don't resize easily, which is why I've removed them in some cases.

Rep ID: Climate142

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Salisbury City Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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.

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

- 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.

A3: How should these actions be delivered and measured?

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.

B1: If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out

above go far enough?

- 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.

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?

- 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.

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?

- 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.

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?

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.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Yes, see previous response.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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

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?

- 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

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

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".

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?

- 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.

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?

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.

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?

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.

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?

- 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.

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?

This is a technical question for DNOs/DSOs.

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?

- 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.

Rep ID: Climate143	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Miller homes	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate143
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?	
<p>A specific policy that encourages a 'proactive approach' to climate change mitigation and adaptation through design would reflect national guidance (NPPF paragraph 149), as well as reflecting the objectives of the Climate Emergency. This approach is therefore generally supported and should make a contribution towards reducing carbon emissions.</p> <p>It will however be important that such a policy should incorporate sufficient flexibility without setting prescriptive requirements as to how these aspirations are met. A target reduction in energy consumption over and above building regulations could be established (subject to being supported by evidence) however, the policy should not set out prescriptively how this should be achieved. For example, it should not include a specific proportion of energy consumption to be provided by a certain type of energy.</p>	

Prescriptively setting out proportions of energy that should come from a particular source will not enable the flexibility to address site-specific or changing circumstances during the plan period. A prescriptive approach could therefore result in the delivery of housing / other development being compromised and would not be supported.

Further, such a prescriptive policy would not take account of the fact that all policies should be focused on energy reduction in the first instance. The overall target to reduce energy consumption should first be achieved, where possible, through use of energy efficiency measures such as a 'fabric first approach' and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies, which could include 'allowable solutions'.

Appropriate account must also be taken of the financial and viability implications of any such policy, and additionally the financial and viability implications when considered cumulatively with other policies, to ensure that the delivery of housing and other objectives is not compromised.

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

As set out above, residential development in particular should be required to reduce energy consumption in the first instance through a fabric-first approach, prior to considering the use of renewable and/or low carbon energy either on or off-site alongside potential offsetting measures.

The policy should also incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met (for example policies should avoid requiring energy to be provided via a specific method, e.g. solar panels, district heating etc.).

As part of achieving 'net zero carbon', measures such as off-setting and allowable solutions should be considered. As part of the consideration of off-setting and allowable solutions, we would therefore welcome details as to how the cost per tonne of carbon/ other measures associated with allowable solutions will be calculated to ensure that the financial and viability implications of any such policy are fully considered.

A3: How should these actions be delivered and measured?

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

The measures set out provide a good framework for the consideration of future development. The first line of policy theme 1, 'Development should be planned for with the future in mind' is particularly important. A flexible approach to site selection should inform how sites are future proofed. This must include carefully considering how the sustainability and climate change criteria can most appropriately be achieved, whilst balancing these requirements with the fact that some development, around, for example Malmesbury, is necessary. Sites adjacent to the existing built form of Malmesbury may actually be less sustainable, for reasons including flood risk than sites not previously considered, such as land to the west of Milbourne.

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?

Whilst in principle this approach is positive, any policy should incorporate sufficient flexibility to address site specific or changing circumstances during the plan period and should not prescriptively set out how these requirements are met. The financial and viability implications of such a policy must also be considered both in meeting the individual policy requirements and cumulatively with other policy requirements to ensure the delivery of housing and other objectives is not compromised.

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?

The measures set out provide a broad framework for moving towards a net zero carbon future. It is noted that the policy theme 3 includes the following, 'This effectively means that the zero carbon 'rating' of all new development should be achieved on-site through the fabric of the buildings (energy efficiency), plot orientation, plus the incorporation of renewable energy generation.'

It is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)

Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.

Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

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?

As set out in B3 above, it is not considered realistic to require all new development to be 'zero carbon' from adoption of the plan. To ensure the net zero carbon target is achievable by 2030, without compromising the delivery of housing and other objectives in the plan, it would seem more realistic and viable to implement a 'stepped approach' towards this target.

Further, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.

Having a target of 'zero carbon' within a policy would go beyond both the national target (which relates to 'net zero carbon' and Wiltshire's own target, of being a 'net carbon neutral' by 2030'.)

Carbon neutral means that while some emissions are still being generated by a building/process these emissions are being offset somewhere else making the overall net emissions zero. Wiltshire's target of being 'net carbon neutral by 2030', appears to be ahead but in accordance with the national target.

Any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions

to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. A flexible approach will help ensure that housing delivery and other objectives are not compromised.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

As above, a requirement to achieve 'zero carbon' (not 'net zero carbon'), means there appears to be no flexibility in how the policy is achieved, for example through off-setting or allowable solutions.
Again, as above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. Viability evidence to consider both this requirement and other requirements cumulatively will be key alongside the flexible approach as outlined above, to help ensure that housing delivery and other objectives are not compromised.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

As above, any policy wording should therefore target 1) a stepped approach to carbon reduction and 2) seek to achieve being 'net' carbon neutral by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero. It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out. Furthermore, a more flexible approach will help ensure that housing delivery and other objectives are not compromised.

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

It is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved. The targets should be referenced and refer to the fact that these 'could', for example, be achieved by including certain on or off-site types of renewable energy.

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?

As above, it is understood that the purpose of the policy is to reduce carbon emissions to contribute to Wiltshire's target of being a 'net carbon neutral district by 2030'. If the overall target is to reduce carbon emissions, (rather than increasing renewable energy use) then the policy should not be prescriptive as to how the carbon reductions will be achieved and should not set targets for the production and use of renewable energy. Furthermore, assuming the primary aim of any policy is about achieving a reduction in energy use and in particular carbon reduction, the policy should firstly promote a reduction in the actual energy use, through a 'fabric first' (or energy efficiency in the design of buildings) approach. Any policy which focuses on targets for the production and use of renewable energy could conflict with the overall aim of energy reduction, by placing more weight on achieving a target around the production and use of energy rather than an actual reduction in energy consumption.

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?

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?

The principle of increasing the level of self-containment within Wiltshire's settlements as it is considered to offer 'the best solution for tackling unsustainable, carbon-based travel patterns' is a logical and sound approach.

Whilst development must be sensitively designed around its constraints, which themselves contribute to the special character of the area, these in themselves should not be a barrier to further development around Main Settlements such as Malmesbury. The Emerging Strategy must allow for such growth around Malmesbury in order for the objectives around sustainability and climate change to be delivered.

Areas close to the centre of Malmesbury, such as at Milbourne should be considered in terms of their ability to fulfil the role of accommodating some of the necessary growth around Malmesbury. Sensitively designed development, can maintain the separate identity of Milbourne, but could actually be located much closer to the centre of Malmesbury than some of the sites put forward for assessment. This would therefore help to meet the wider objectives of the Council associated in particular with tackling unsustainable carbon based travel patterns.

The spatial strategy must be flexible enough for sites such as this to properly be considered to enable these wider objectives to be delivered.

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?

As above, a practical step is ensuring the spatial strategy is flexible enough to allow for the necessary growth around 'Main Settlements' such as Malmesbury to accommodate growth on sites unconstrained by flooding or other key constraints and located physically close to Malmesbury, such as at Milbourne.

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?

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?

As above, any policy wording should target 1) a stepped approach towards being 'net carbon neutral' by 2030 and 2) ensure any planning policy also has a target of being 'net carbon neutral' (not zero carbon) by 2030. This would allow additional flexibility in how the overall target will be achieved, through enabling some emissions to be offset elsewhere if necessary/ appropriate, whilst still ensuring that overall the carbon emissions are zero.

It is important that the policy wording does not restrict potential opportunities for the supply of energy from renewable energy sources, such as those from nearby off-site renewable sources. These policy alterations should ensure such opportunities are not ruled out.

Furthermore, a more flexible approach will help ensure that the energy reduction requirements do not negatively impact on the design and viability of schemes to the same extent. However, further evidence is required to enable the energy requirements to be considered cumulatively with other requirements to ensure housing delivery and other objectives are not compromised.

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

Rep ID: Climate144	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Hallam Land Management	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate144
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?	
The most appropriate mechanism to address climate change through the local plan process is the distribution of development – directing development to those locations where there are opportunities for employment, and/or are well served by the public transport network	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

A3: How should these actions be delivered and measured?

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

Flood risk policy must reflect national policy and guidance. The Environment Agency set the level of greenfield runoff rates, including the appropriate plus climate change scenario. This will change over the course of the plan-making process, and then again over the plan period. As such, we suggest no explicit standard is provided. We assume this pertains to the reference to a 20% betterment – with the delivery of the plus climate change scenario creating a betterment against existing rates of runoff. This should be clarified, and if a separate measure is being proposed locally this must be clearly set out – in terms of precisely what the requirement is and what it is measured against, the additional costings must factor into the LPR Viability Assessment, and the additional land-take identified for the Preferred Sites.

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?

The introduction of the concept of Natural Capital is unhelpful – this reflects a specific policy approach which differs from the national approach.

The Authorities response to the Green and Blue Infrastructure Network should be captured through the national requirement to draft Local Nature Recovery Strategies, and the forthcoming legislative requirement to deliver net biodiversity gain.

We note that Figures from the GBI Plan have been published within the Topic Papers, but not the strategy in full. This should have informed part of the consultation evidence base, and would have otherwise informed respondent's answers to this question. We support the intention to implement biodiversity net gain in accordance with the forthcoming regulations, and suggest that it is not necessary to repeat these in detail in the LPR.

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?

The Government is progressing with national changes to building regulations associated with zero carbon ready homes through the Future Homes Standard; and we note that an update has been published since the drafting of the consultation document. The Future Homes Standard is a two-stage approach to reach 'carbon ready homes' by 2025. This is expressly referenced as a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The role of developers is to achieve a 75-80% reduction in carbon emissions – with the residual reduction a society wide move towards decarbonised energy sources.

Whilst we generally support the Council's ambition to ensure that new developments mitigate and adapt to the impacts of climate change, we would have very significant concerns if local policies set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government.

The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to 'climate change' advises that:

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability". [Paragraph Reference ID: 6-009-201503 Any standards set above the national Building Regulations, will need to be demonstrated as feasible, viable and achievable in practice, and will need to be balanced against wider aspirations in the LPR, such as the delivery of affordable housing.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Decarbonising energy through new development is integrated into the Future Homes Standard – there is therefore no explicit requirement for a separate policy. Traditionally, local plan policies have set an explicit standard for the delivery of renewable/low carbon energy on site; however, this will no longer be required with the Future Homes Standard. Every site and scheme will differ – and the most appropriate technology will need to respond to this. We therefore suggest that the policy should remain flexible, and no particular technologies should be favoured.

In line with the wider societal move to decarbonising our energy supply, and recognising that this pertains to existing housing/development, WC should enact a permissive policy to the delivery of standalone low carbon/renewable energy schemes.

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

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?

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?

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?

The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that any policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.

We recognise that WC have committed to undertaking proactive discussions with the energy providers in this regard, and this is supported. The cost of any upgrades to the energy network to support any draft policy requirement will need to be factored into the Viability Assessment, and also the Infrastructure Delivery Plan. There will need to be a balance between passive and active charging facilities, and we suggest that this balance needs to be informed by an evidence base on 1) current demand (i.e. ownership), and 2) immediate future ownership (i.e. within the first 5 years of the plan period). Any development plan must be reviewed every five years, and thus the policy will be able to respond to the rapidly evolving technology at its next review.

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?

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?

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?

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

Rep ID: Climate145

Consultee code: General Public

Consultee Organisation (if applicable): Ramblers Association

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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 refer to the Comments filed by [Name redacted] on behalf of the Ramblers Association, Wiltshire Area Committee, which I endorse whole-heartedly..
[Name redacted] sets out very clearly the practical steps needed to encourage Active Travel by walkers and cyclists by making the best possible use of the 4,000 miles or so of public rights of way in the County. As a Ramblers activist myself, I was very disappointed that the proposals to date had no mention of this.

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?

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?

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

Rep ID: Climate146	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Barratt Homes	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate146
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?	
<p>It is not anticipated that the LPR will be adopted until Q2 2023. Between now and then the Government has indicated that there will be significant changes at the national level in regard to climate change and biodiversity net gain. It will therefore be necessary for the LPR to be mindful of the changes to the national legislative regime, in particular in regard to Future Homes Standard, biodiversity net gain, energy provision, and electric vehicular charging.</p> <p>Barratt have committed to becoming the country's leading national sustainable house builder and have published a sustainability framework which aligns their ambitions with the UN Sustainable Development Goals¹⁰. It is these goals that are referenced in the dNPPF, at paragraph 7, and are being used by many Authorities in setting the sustainability framework for emerging Local Plans.</p>	

This commitment includes new homes design to be net zero carbon from 2030; with improvements towards this standard made over the coming 9 years, pre-empting the Government legislation by committing to biodiversity net gain from 2020, and seeking to increase the use of Modern Methods of Construction to 25% of homes by 2025.

Barratt welcome the commitments set out by Wiltshire Council in seeking to actively address climate change and biodiversity net gain through the LPR; and commit to working positively with the Authority to deliver enhanced sustainability standards over the coming years. The scale of change required in the industry is substantial, and it is necessary to ensure that developers and Authorities work collaboratively to the end goal of zero carbon in a phased process – which sets the step change in standards at a rate which is deliverable by the industry.

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

By far the most significant opportunity to address climate change and reduce carbon emissions is through a spatial strategy which promotes sustainable patterns of growth, and maximises the opportunities for sustainable travel.

Central to this is understanding where people live and work, and the opportunities for walking/cycle and public transport to create modal shift. This will also need to be informed by changing working patterns as a result of Covid. This should inform the distribution of housing within the spatial strategy. We have not seen any analysis in this regard – and the focus on the delivery of two bypasses as major indicators for growth appears fundamentally opposed to this objective.

We note in this regard that the Wiltshire Local Plan Transport Review (January 2021) indicates that the ‘Next Step’ is to consider the 15 minute neighbourhood, and how development can aid the carbon reduction agenda (Section 4.4). This confirms our fundamental concern that the consideration of the most sustainable locations for large scale development have not appropriately considered this at the outset because reasonable alternatives have been discounted too early in the process.

A3: How should these actions be delivered and measured?

B1: If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out

above go far enough?

We agree with the measures set out in the consultation document, and it will be necessary to demonstrate that they are compliant with the Framework. In line with the NPPF, there is no need to duplicate policies from the Framework (paragraph 16) in the LPR.

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?

We support the intention of the consultation document in emphasising the importance of blue and green infrastructure. The emerging Green and Blue Infrastructure Strategy (GBIS) needs to be published in full as part of the evidence base informing the LPR, as it is difficult to comment on the individual maps provided within the contextual information.
3.10 We suggest that the concept of the GBIS is amended in the LPR to align with the national requirement to create Nature Recovery Networks.

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?

As set out above, Barratt Homes committed in 2020 to their homes being net zero by 2030; and will be moving towards this target over the 10 year period. The Government have subsequently published its response to the consultation on the Future Homes Standard – with this confirming a two-stage approach to reach ‘carbon ready homes’ by 2025 (being a 75% reduction in carbon emissions). The first stage in reaching this target has recently been published with draft Building Regulation changes at consultation.
3.12 Barratt Homes remain committed to their net zero target, and will be aligning the stages in reaching net zero by 2030 with the Future Homes Standard. This reflects the need to develop supply chains, skills and construction practices. Where there are opportunities to go beyond Building Regulations – these will be explored, and there are numerous examples of Barratt Homes doing just that such as the first ever large scale zero carbon community at Hanham Hall. At present, these schemes are

individual, based upon site specific characteristics (and viability), and we do not consider that a Wiltshire-wide zero carbon homes standard would be achievable or deliverable in the short term.

3.13 In bringing forward local policies which differ from national standards, or are implemented earlier, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

The Future Homes Standard includes the decarbonisation of energy, and there are also individual legislative changes coming forward, for example the forthcoming ban on gas boilers. There are a significant range of low carbon/renewable energy technologies available for new homes, and the sector is constantly evolving. We suggest that the LPR should not set out a preferred type of technology – and that it will be for the individual site conditions to determine which represents the best opportunity both in terms of feasibility and viability. In bringing forward local policies, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of these policy requirements.

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

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?

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?

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?

We set out our comments above on the role of sustainable travel choices and modal shift in underpinning the spatial strategy; and this is intrinsically linked to addressing air quality.

3.17 In regard to the installation of smart charging, we note that a Department for Transport 2019 consultation considered potential regulations in this regard – and this included analysis of the ability to deliver this at scale; including indicative costs, and also the implications on the capacity of the electric network. This indicated that in some instances, the costs would render a scheme unviable due to grid capacity constraints. We therefore welcome the intention of the Council to engage now with the network operators to produce the evidence base on the costs associated with the network upgrades and the cost of installation. This will need to be factored into the Viability Assessment and Infrastructure Delivery Plan (IDP) supporting the LPR.

3.18 Any policy requirement should be based upon an assessment of need – both current and future, and should balance the need for passive and active charging.

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?

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?

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?

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

Rep ID: Climate147	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): National Farmers Union
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate147
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?	
Yes, we believe that the Local Plan could deliver real change in the counties carbon emissions and mitigation by 2030.	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
Any steps the Local Plan takes to achieve carbon neutrality that have an impact on, or are based on actions by, the agricultural sector should be built in partnership with the farming community and their knowledge of the land and environment which they manage on a daily basis.	

A3: How should these actions be delivered and measured?

The Local Plan should support farming businesses in developments which improve productivity (and therefore efficiency) or enable them to remain compliant with regulation. It should allow space for on farm renewable energy development – for business or community use – and act favourably to enable farms to mitigate against climate change impacts. The Local Plan could also seek to ensure farms are adequately compensated for providing goods of wider public benefit. For example, by: accepting an increased level of flood waters from new residential developments; or sequestering carbon through tree planting or land use change to mitigate others emissions etc.

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

Agriculture has a role to play in catchment scale flood water management and can also be directly, and negatively, impacted by run-off from poorly planned development. Policy Theme 1 might look into supporting farm business in the ‘public service’ role they offer in this context. The Policy Theme says that ‘where technically feasible all areas of hard standing in developments should be constructed using permeable materials to reduce surface water runoff.’ Should this statement relate agricultural business developments also, then consideration should be given to the health/ safety / welfare/ quality/ implications of using none-standard materials in farm building works.

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?

Should Green and Blue Infrastructure and biodiversity requirements impact farm developments then consideration must be given to the existing on-farm work already done to enhance and maintain the natural environment through past and current voluntary

schemes, rather than impose further requirements. 'Access for all' should also be considered on a case by case basis, to ensure it is appropriate and safe.

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?

As mentioned elsewhere, we would see that agricultural developments (specifically business development and succession/ staff housing) be excluded from the need to meet sustainable transport requirements. Where this means having access to public transport we feel this measure cannot be fairly applied to businesses within the rural area, which traditionally have poor public transport systems locally.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Financial incentives, or support, for new and existing buildings to move towards reducing carbon emissions will be important for small developments or private dwellings where imposing such measures may make the venture financially impossible.

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?

The role of agricultural businesses in the generation and storage of renewable energy should be recognised and supported as part of the Local Plan.

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

All available technologies should be embraced and supported by the Council and businesses should be able to choose the production/ use options which are most appropriate to themselves.

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?

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?

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?

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?

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?

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?

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

The Climate Change Act commits the UK to reach carbon neutrality by 2050 – the NFU's members are committed to reaching carbon neutrality within the agricultural sector by 2040 and require the assistance of Wiltshire Council to achieve this. We believe that this should be entirely possible, and possibly even sooner - given the Councils own commitment for the county, and the Council, to become net carbon neutral by 2030.

Agricultural businesses will be the first to be impacted by the changing climate. With hotter, drier summers, milder wetter winters and an increase in frequency of extreme weather events will come the challenge of new pest and diseases; impact on the type or number of crops and livestock we can produce; pressures on land management; and threats to farming systems.

Agriculture is uniquely placed to be part of the solution, as both an emissions source and sink. As farmers we have a special responsibility to protect carbon reserves already in our soils and vegetation, for example – and we can do more within the arms of a supportive Council. For Wiltshire's farmers to become net carbon neutral either in line with the Councils 2030 ambition, or the NFUs 2040 ambition, they will need a range of measures that fall under three broad headings:

- 1.Improving farms productive efficiency.
- 2.Improving land management and changing land use to capture more carbon.
- 3.Boosting renewable energy and the wider bioeconomy.

At the same time as reducing the industries impact on the climate we should not reduce our ability to produce safe, high quality and affordable British food. The UK must not achieve its climate change ambitions by exporting UK food production, or our greenhouse gas emissions to other countries.

You can read more about the NFUs Agricultural Net Zero Ambition online here: [Net Zero 2040](#).

Further comments on the Local Plan Climate Change Document are as follows:

Section 2.4: the Local Plan states that it will seek to reach carbon neutral ambitions will be achieved through 'a combination of reducing carbon emissions through using energy more efficiently and moving towards greener forms of energy, as well as carbon offsetting techniques such as afforestation.' The Councils afforestation ambitions should be discussed closely with landowners to ensure planting in appropriate areas, for example ensuring that the best and most versatile land is not taken from food production and that forested areas can be sufficiently managed to ensure their long term viability.

We welcome the Local Plans ambition to provide for more renewable energy developments, as discussed in section 3, within the community or business and remind the Council that agricultural holdings are often a great place to develop these – meeting both local renewable energy output and underpinning the business as a whole though a long term and secure income source.

3.7: Ambitions for land use change (through a coordinated programme of afforestation and carbon capture) and environmental protection must be built in partnership with the farming community which it directly impacts. As previously mentioned, reaching net zero emissions must not cause a reduction in our ability to produce food within the county or country – this will simply export our carbon and environmental impact to other countries which will undermine the entire domestic ambition.

4.6: The five themes identified by the Global Warming and Climate Emergency Task Group are admirable and would generally support positive growth and development of Wiltshire's farm businesses. It is important to note, however, that given the rural location of farm businesses they are likely to be far from reliable or regular public transport routes and so any farm project (including housing for succession or to secure quality staff) should not be measured against its ability to meet theme 5: sustainable transport. This would be an unrealistic and impractical expectation to benchmark rural business against in our county.

4.8: We are pleased to read that large developments will continue to require Sustainable Drainage Schemes plus 20% to allow for changing and volatile weather patterns. As you are aware runoff from such development can have major impact on farmland and can limit its ability to produce quality food, environmental outputs and other public services. Should the wider catchment be relied upon to provide flood mitigation services then this must be done in close consultation with the agricultural sector. As an industry we look forward to support from Wiltshire Council and the Local Plan in achieving our joint carbon-neutral ambitions over the coming years.

Rep ID: Climate148	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>I strongly support the ambition evidenced here.</p> <p>It must be assumed that a Local Plan can contribute towards reducing carbon emission. The task is challenging and extends far beyond land-use planning, but Local Authorities can take a lead role in advocacy by championing sustainability, in supporting and enabling communities to identify local solutions, and through developing integrated approaches to land-use planning.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

The Wiltshire Council could assume a key role in supporting local communities through the integrated development of Neighbourhood Plan policies which address local renewable energy schemes, sustainable transport, sensitive re-use/recycling and 'decarbonising' of existing building stock. The Council's resources and expertise should be expanded and enhanced to provide such support.

A3: How should these actions be delivered and measured?

No one-size-fits-all answer; all policies should identify measurable outcomes

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

Possibly not, but the policies provide a good starting point

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?

Again, possibly not, but a good starting point. A Habitat Biodiversity Audit, such as that initiated by Warwickshire County Council and other partners in the 1990's, managed by the County Wildlife Trust and subsequently maintained and updated, would provide high quality baseline data against which enhancement could be measured.

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?

Selection of building fabric, building design and orientation, density &c should pay due regard to local character and distinctiveness. Retro-fitting also needs to be sensitive to context. Clearly there is a balance to be achieved between achieving sustainability objectives and maintaining local character, but the two objectives need not be mutually exclusive.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Failure to do so will materially affect planet viability!

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

If there are emerging standards it would be advisable to see what they are, but Wiltshire's ambitions might extend further. One might be cautious about accepting any proposed new standard put forward by the government given the underwhelming scope of vision in the recent Planning White Paper, and the eagerness to extend Permitted Development Rights, which threatens to undermine strategic land-use planning.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Through encouragement and facilitation of building sustainability audits

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?

Pleased to see that problems of adapting existing buildings which are Listed or in Conservation Areas are recognised.

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

Encourage all technologies; determine on individual merit

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?

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?

Suggest working with Historic England to develop guidance

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?

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?

Increasing availability of public transport, particularly in rural areas, would be a major help, although largely falling outside scope of Local Plan

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?

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?

More stringent requirements would necessitate the major volume housebuilders to consider seriously the quality of what they are building and the relationship of design to local context; this could lead to better quality housing.

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

Direction of travel evidenced here is encouraging. The Council should seize all opportunities to publicise the steps it is taking and to encourage all to act locally.

Rep ID: Climate149

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

The Council voted in 2019 for the target of reducing Wiltshire's carbon emissions to net zero by 2030. I don't see how this local plan which covers the period up to 2036 has the ambition to turn this rhetoric into policy to achieve this. The Spatial Strategy section seems to have as its main focus the need to achieve an outdated Government housing target – and even aims to over provide by around 5,000 houses, with all the extra roads and transport emissions this will entail. There has been insufficient time allowed for people to be aware of the huge increase in the size of Chippenham – with the new road scheme being advertised mainly in terms of relieving traffic, when it is tied to a large increase in the number of cars from the extra housing. The Pandemic, and Brexit have both made obvious our need to be more self-sufficient in our food supply , but you plan to concrete over valuable arable land.

The plan needs to be updated with the Climate and loss of biodiversity crisis at its heart, taking account of lessons learnt from the Pandemic. Consultation should be lengthened due to people's attention being elsewhere due to the Pandemic

Rep ID: Climate150	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Avison Young
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Lone Eagle Retail Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate150
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?	
<p>We welcome the publication of the Council’s initial considerations for how the Local Plan can help to address the issue of Climate Change. In this regard, we would reiterate our comments above in relation to maximising the use of brownfield land in settlements to support growth within the County. This would have multiple benefits to encourage the effective use of land (in accordance with paragraph 118(a) of the NPPF), reduce the need to travel by private car and encourage the use of sustainable modes of transport. Without optimising the use of brownfield land, we question how the Council will be able to fully address the challenge of climate change within the plan period. For example, the location and scale of large development to the east of Chippenham does accommodate future growth. However, in the absence of a robust and proactive policy to also maximise brownfield development, this future growth will not make effective use of existing sustainable transport infrastructure such as the railway station and local bus services.</p>	

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate151	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Barton Willmore
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Gallagher Developments	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate151
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

We support this policy in anticipation of the forthcoming Environment Bill.

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?

We support good design principles to achieve sustainable development. Our comments on technical standards for homes are set out below.

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?

We support the aim to achieve zero carbon swiftly, but we would encourage the Council to ensure that any deviation from Building Regulations (including the timing of Future Housing Standards) is properly tested, to ensure it is deliverable. We would encourage the Plan to rely on national standards so that it does not become out of date as these evolve e.g. through Future

Homes Standards. Gallagher is committed to delivering innovative solutions and this will be outlined in our future vision proposals.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

We generally support the approach set out in Policy Theme 4, however we would caution against being too prescriptive, as this could become out of date compared to evolving national standards and emerging technology. We support sustainable energy generation for the allocations where feasible, but consider that for Site 2, any standalone solar panels would be better located towards the periphery of the development so that the most accessible areas are more efficiently used for residential development to minimise unnecessary trips. Any requirement for on-plot measures should be tested through the viability study to ensure deliverability. We support the consideration of district heating networks as a key plank in the measures to achieve zero carbon.

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

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?

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?

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?

Directing significant growth to sustainable urban extensions such as in Chippenham will be the most important step in helping to deliver these goals. Discussions with public transport operators should be undertaken to ensure a joined-up approach between public transport provision and the phasing of development. These improvements can be delivered via contributions and our Client is supportive of modal shift.

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?

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?

Early discussions with providers will need to take place to ensure the requirements of the Plan are deliverable.

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?

Any measures which are too prescriptive or which go above and beyond national standards may not be deliverable or may become out of date. The Plan must protect against this and be supported by robust evidence on viability. Development phases that would deliver beyond 2025 should retain flexibility in design to allow for the rapid emergence of innovative new technology and solutions.

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

Rep ID: Climate152	
Consultee code: Other	Consultee Organisation (if applicable): Sustainable Coppice Partnership
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate 152
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?	
<p>While I understand that the plan is focussing on housing need, I cannot find any overall strategy for the Council to include important components of sustainable planning and climate change resilience, such as transport, education, employment, health and wellbeing. Please could you direct me to those components of the plans? Again, I apologise if the targets and operational methodologies are somewhere in the reports but I couldn't find them. If not, the plan does need to include a commitment to meet all these components with specific targets, as a matter of urgency.</p> <ol style="list-style-type: none"> 1. Siting new development where (1) it is most needed (2) numbers are supportable (3) it reduces car use (4) it improves public transport usage (5) genuine sustainable settlement designs are provided (6) greenfield sites are avoided 2. A commitment to ensure all new developments are built to zero carbon standards (as was part of planning law for 2016 before the current government removed that obligation). 	

3. How will road schemes take into account realistic projections of future traffic volumes and ensure that local and national climate change policies, and longer- term changes in work patterns as a consequence of COVID-19, are properly measured and incorporated into the plan?
4. Create a planning framework that promotes renewable energy generation, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan?
5. Encourage a significant shift away from private cars to public and active transport, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles?
6. Protect and enhance the carbon absorption properties of the natural environment, including significant increases in tree and hedge planting, also helping to improve biodiversity, and SUDS schemes, mainly through permeable surfaces to reduce damaging run-off with all the negative outcomes for nature and people that brings?
7. Protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, as well as helping to restore dangerous declines in important invertebrate populations crucial to food production, including the Council's own County farms.

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

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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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate153	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>This is a negatively-framed question which misses the point. WE URGENTLY HAVE TO REDUCE EXISTING CARBON EMISSION TRENDS BEFORE 2030 if not before, as Wiltshire Council agreed in Feb 2019. It has been shown that 2050, with an emphasis on delivery before wherever possible is achievable (CCC and many other organisations set clear pathways to reductions) but this decade is widely known to be the crucial one for turning the ship around on a monumental scale. As it future-proofs our existence on a warmed and likely to be warming for decades to come planet, we cannot afford (financially or otherwise) not to act with utmost urgency.</p> <p>The Climate Change and Biodiversity Net Gain paper sets out the ways in which this must be achieved, although there is still too much hedging on when and how this will happen overall. The paper attempts to explain the lack of structure and regulation to date on low-carbon planning, but in so doing exposes the vital need for this and the missed opportunity that the council have had over the last two years to start embedding the 'golden thread' so that it is already running through this draft local plan.</p>	

The Climate Emergency Task Group have made all the relevant recommendations and have exemplified these from successful models. It encourages the council to take pro-active and direction-changing stances to ensure that future development (or what we choose not to develop) is centred around sustainability, not to wait for government policy to provide a totally unambiguous mandate for enforcing this, which will arrive too late. The council seems aware of what it has to do, has analysed the gaps, but reaching the synergy between relevant parties to enact the right changes still seems a very long way off.

This is disastrous when it enables plans to take shape (and all the work involved and momentum building up behind them) that are in fact first worsening an already very challenging problem. The Local plan for Chippenham is one such example, I hope the biggest one as I have not had time to compare to what is planned for Salisbury, Trowbridge and other smaller settlements.

Chippenham's plan incorporates many of the recommendations in the vision for the new sites, but it has overstepped one clear and obvious parameter in the first place – that the huge urban extension on greenfield land requiring a new road and likely to support and influx of out-commuting car using wealthy families rather than supporting real local need, will release huge amounts of stored emissions from the land, and more in its construction and more in its ongoing use. As attractive as it sounds, creating a leafy suburb with lots of active travel routes and using sustainable energy and zero carbon building methods will not help with carbon reduction overall as is misleadingly claimed, it will just be neutralising a little of the damage it has done. On existing sites, preferably brownfield or interconnected with existing infrastructure, well-supported by employment and justified by real local need, yes please to all of the utopian ideas so keenly laid out. Transport represents 40% of emissions and is clearly key to a reduction in emissions in Wiltshire. But building in more roads, responding to a myth that this will ease traffic congestion as is a central argument in the Chippenham plan, will only reinforce our dependency on cars, and the continuing dominance of private car use as the way to get around, totally undermining key messages which will transform attitudes into the future.

The solution to the climate and ecological emergencies often lies, after all, in what we are prepared to stop doing, as well as what we can do differently. The Council should and can lead on this, rather than leading on a best-fit alignment with existing attitudes and practice which requires fudging, hedging and to be frank, lying and greenwashing to seem to respond to the climate and ecological emergencies.

All this, as the Climate Emergency Task Group have recommended, would be altered by the rapid establishment of a carbon budget tracking fair year-on-year calculations for the county and each area, and a corresponding set of requirements for local plans and for developers to incorporate and to work within a rigorous and standardised evaluation of the carbon that a development will produce and how this will be best mitigated.

Immediately this puts plans such as the one for Chippenham into context as the unsustainable, wrong-headed and irresponsible plan that it is. I would like to quote a local resident (and successful businessman who has committed to educating himself through courses online and now has demonstrable expertise on sustainability best practice), commenting on Chippenham Town Council's PET committee report on Local Plan:

'I have used Professor [NAME REDACTED] fair carbon budget proposals in my calculations and these leave a remaining carbon budget for Chippenham of 1.69 Megatonnes of CO2 to remain within 1.5 degrees C warming. The proposed housing built using current typical construction techniques uses at least half of that budget (0.825 mega tonnes). I have not calculated for roads and infrastructure, or for the carbon disturbed from land in the build. In short the proposals do not leave enough remaining budget to reach carbon zero by any measure. Quite simply the council has its priority wrong'.

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

I haven't time to come up with a full list, but this has already been done to an extent and my answer would be based on the implementation of all recommendations from the Climate Emergency Task Group's on planning, energy and transport. Again this question seems to cynically challenge the respondent to come up with 'practical and achievable' (somewhat subjective concepts) which seem palatable to the Council. I would suggest that I'm afraid what is needed is more far-reaching than what has been considered to be, in an everyday sense, practical and achievable, to date, or rather a change of mindset which may seem at first an uphill battle. The council needs to find ways to change tack with immediate effect, so that the planning team are supported in efforts to plan in a truly sustainable way, not working at odds with other traditional mainstay council priorities (highways dominance for example), and are therefore able to plan as effectively and as quickly as possible to respond to the risks that are posed by Climate Change (and the opportunities).

It should ensure that carbon emissions are calculated at every stage and that this is a meaningful exercise in that it enables enforcement of higher ambitions, required standards or the stopping of projects altogether.

It should proactively work on the basis of anticipated changes in Wiltshire's Climate strategy and national policy now rather than using the time and uncertainty afforded by government policy lapses and delays to squeeze in more developments with deepening ramifications for climate.

The local plan needs to be centred around sustainability in it's true sense – i.e. what is capable of delivering net reductions in carbon year on year with immediate effect.

Referencing this notion of what is 'practical and achievable' the plan should not, I would suggest, even consider large scale developments on greenfield sites requiring massive amounts of mitigation and adaptation to future risk, at this time. Surely it is more manageable to do things cautiously, and to do what can be done sustainably and use this as a guiding principle for possible growth, not some nuanced idea of 'need'. This would include an active and ongoing scoping for brownfield availability.

A lot of time, effort and money has clearly been put into the plans for Chippenham which I do hope don't come to fruition. Practically this time could have been spent on working towards, rather than against the unavoidable need to redress the damage done to the climate and environment.

I appreciate that there is a significant challenge and a period in which conflicting priorities are built in to the demands that Council's are asked to respond to, but I would say the first thing the council must do before anything else is to get it's Climate Strategy set and use it as the 'golden thread' it is intended to be. This may involve the Council recommitting to it's climate declarations as these seem to have been lost somewhere, and ensuring that training and a singular message about the vital importance of acting on those declarations permeates through the entire organisation and its policy and practice shaping from here on in. This would enable staff to work together, to bring in communities and concerned groups to support, to clearly signal the change required and engage trust from local communities (rather than despair, confusion and distrust) in what will be trying times ahead.

A3: How should these actions be delivered and measured?

Covered above – reference to carbon budgets.
Use examples from other LAs.

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

I am of the impression that SUDs is an emerging technology. It is also acknowledged within this paper that flood risk will be exacerbated by climate change and land use changes into the future. Using the example of Chippenham, and the 'preferred sites' having 'moderate' flood risk where mitigation measures are stated to be 'achievable' rather than straightforward, it seems foolhardy to take on the financial and practical burden of building so extensively on areas so close to flood plain and with flood risks already evident now.

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

See Climate Emergency Task Group recommendations and get going!!

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?

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 see separate response on transport.

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?

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?

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

No time to answer the bulk of this but I think the paper is excellent – it just needs to mean something in the real world!

Rep ID: Climate154	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate154
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?	
<p>Evidence: The scientific measurement evidence clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure. This is the fundamental evidence that National, County and Town Land Use Policies need to urgently and fundamentally change away from the goal of Economic Growth to a new goal of Green Economic Growth. All economic sectors that emit should de-grow and only sectors that harvest and sequester should be targeted for growth.</p> <p>Realistic: The reality is that here in Wiltshire the annual average temperature has increased by 1.69°C since 1960. The reality is that IF global carbon emissions get to Net Zero by 2050, global warming will only change from increasing exponentially to increasing linearly. The reality is that there is no choice but for the Local Plan to focus on Climate mitigation rather than Human Comfort and wealth.</p>	

Viabile: We need to change what you mean by viable. When you say “Viabile” here, you mean “financially viable”, which uses the construct of money to indicate the further accrual of wealth and comfort to individuals or society. The Climate and Environment do not care one jot about money. Wiltshire Council need to change their value metric for the measurement of viability away from money/wealth to planet/nature.

Achievable: We have No Choice but to succeed in reversing existing carbon emission trends and then achieving significant Carbon Sequestration. We could lead the way as a county, if only the leaders believed in the pro-green rhetoric they consistently Act against. We could show other counties how to do it if every member of WC rowed in the same direction and make a national difference ... if we chose to.

Our Political Leadership is focussed on Economic Growth and wealth creation. That policy turns the resources of the planet into money using the work of the population. I do not think it is reasonable to assume that the Local Plan will make any difference at all to the aspirations and methods of these Leaders. The evidence is clear: at the national level, ministers over-rule climate/ecological arguments on anything they choose to e.g. HS2, Stonehenge A303, Coal Mines etc etc and our own cabinet leaders take no notice of climate/ecological arguments if they pose a challenge to economic growth e.g. supporting incineration, using glycoposphates, supporting A350 enhancement, planning huge housing estates.

It is not reasonable to assume that the Local Plan will change the core values of these people to give consideration to our dying Nature, Climate and Oceans.

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

The most immediate practical 1st step is to stop all planning to create things that emit huge amounts of Carbon in their making, until we have control of all Global Climate Indicators. That includes all new construction, all new incineration and all new roads. As a stop-gap we need to repair, reuse, re-cycle everything from countryside lanes to buildings to plastic. Let's accept the weather is broken and utilise what we've got.

The most practical 2nd step is to change every instance of “Economic Growth” in the County, Town & Parish Policy Libraries to “Green Economic Growth” where ‘Green’ is specifically and professionally defined to include all things that enhance Climate, Ocean and Ecology and to exclude all things that degrade Climate, Ocean or Ecology

However, that won't be achievable until our leaders show some courage and some leadership on Climate Change. The only way to make the above achievable is to Tell The Truth about how bad the climate and ecological crises are to the population of Wiltshire in order that the politicians have the backing of the population to do what's necessary, which includes fighting anti-

climate and anti-ecological National Policy. Covid-19 proves that when the population understand a problem, 90% will act accordingly to save our skins.

Learning, Talking, Planning are all fine, but to make a difference requires Action. So the agenda of each and every local government meeting should have Climate & Ecological Emergency as the first agenda item and an Actions List should be addressed which contains actions, dates and named action owners. The leaders need to Act Now on the Emergency by deploying all resources, intellect, policy, business, managers and workers in order to address the myriad Climate and Ecological problems in a managed, funded and prioritised way.

Finally, for the politically difficult or ethical difficult decisions, a Citizens Assembly should be regularly used so that decisions which would manifestly be made for the leadership's personal gain, career enhancement, party-political beliefs etc are taken out of the hands of their hands and decided on by an informed cross-section of the population and implemented by the leadership.

The concept of a Civil Servant actually serving the people of the community for the benefit of the community should be reinstated. The current practice of gorging at the trough of business must be stopped.

A3: How should these actions be delivered and measured?

Delivery: The most effective delivery method that I have come across in my professional career for getting things done is the Agile Methodology. Measured against this methodology for failing fast, identifying and prioritising tasks, using expert-led knowledge and many, many more metrics, pretty much every single Local Government meeting I've been to pales into inefficient insignificance. The key is breaking down huge complex Tasks into small Actions in order to Get Things Done, whilst reacting in parallel to real-world interrupts ...of which there will be many and varied soon, caused by extreme weather and food pressure.

Measurement: Continual measurement, quality, performance and progress metrics are an essential and inbuilt part of the methodology which are fully embraced through all tasks by the entire team from top to bottom.

It's what you use to design, build, equip, run, refurbish and repurpose an entire Nuclear Strike Submarine ... on time and whilst making a profit. The number and complexity of the Climate and Ecological solutions required are many times greater than even this complex piece of military equipment.

But, it will require everyone to change and to work towards a common goal with a common purpose and a common belief. Unfortunately, this is not how National Government, Local Government, Town Councils, Parish Councils, even a PCC are traditionally set up.

This would require courageous Leadership on the Climate Crisis and the Ecological Crisis rather than political leadership. There is no evidence of courageous climate leadership being present at National or County or Town level.

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

In this section about successfully tackling flood risk, there is an inherent implication that the countryside land is 'developed' into roads and buildings designed maintain or increase human comfort and ensure that humans have enough clean water to continue with our well-fed and plentiful lives.

Despite the scientific measurement evidence clearly showing that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure, this Local Plan section talks almost exclusively about making climate & ecological problems worse by building over our Natural Capital, commonly known as "The Countryside"... and then you're worrying about how nature might react to this further devastation.

Even without building any more, there is a huge risk of flooding and a huge risk of water management becoming unsustainable. Within the next 40 years, both of these things are not so much "high risk" as "inevitable". This Global CO2 graph determines the trajectory of this Global Temperature Graph and there is a 40 year lag between the CO2 trajectory changing and the Temperature trajectory changing – that's physics.

Global human behaviour (a religion of GDP growth, incessant War, endless Fossil Fuel extraction, Political deadlock etc etc) is not going to change anytime soon – it will require a huge home catastrophe to make that happen, so until then, our countryside is the only weapon we have to enhance our environment, particularly so in this discussion of flooding and water management.

The Countryside is NOT AN ASSEST WAITING FOR DEVELOPMENT, it is degraded and abused Nature, which our society gives so little value to that we are oblivious to the peril our Values are about to bring us. By radically changing farming methods and changing away from concrete, steel and excavation we must re-store natural water defences to protect existing buildings, roads and communities and NOT build more.

We need to completely rethink our flood and water policies to make them integrate into a loved, cherished and valued countryside that is ecologically and climatically enhanced, not for the benefit of human comfort, but for the benefit of all other lifeforms and their environment. Our human built environment should be seen to benefit as a side-effect of intelligent restoration and husbandry of Nature, which like it or not, is our Natural Environment.

Within our existing urban areas we need to think about retrofitting rainwater harvesting, 100% PV installation, unsealing soil by replacing hard pavement surfaces with porous ones, shaming car-worship to make front gardens re-appear, grow ivy up every possible wall in the urban deserts we call housing estates, put plant troughs along every possible double yellow line, convert car parks into allotments and turn multi-story carparks into body-to-soil structures. If you're smiling, hold your thoughts right there, remember them. Reflect on them again in 15 years time.

Leadership needs to stop thinking about build, build, build and start thinking about a Future. This CPRE document is a good place to start thinking about what this actually means for our Rural County's Local Policy.

Every single bullet point of Policy Theme1 on Page 15 relates to New Build. You people need to open your eyes to what's going on in our world, rather than only thinking about economy, efficiency and wealth.

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?

Of course not. Most of the measures are "going" in completely the wrong direction.

How can you enhance Natural Capital by digging it up (killing entire underground eco-systems), dumping the natural capital (soil) into landfill to toxify it forever with modern human waste, then pouring concrete all over everywhere for house and road foundations (excavation).

If you sample the soil beneath the surface of the farmland, hedge land, woodland and wetland anywhere in Wiltshire you will see that it contains significant amounts of inorganic carbon and significant amounts of organic carbon – much of which is ALIVE. This is called Natural Capital. By "Place Shaping" (converting this countryside) to a new built environment, our existing Natural Capital emits huge amounts of CO₂ when inorganic Carbon is reduced by Oxygen on contact with air, it emits huge amounts on NH₄ (Methane) when the dead organic matter is exposed to rot and KILLS all the live organic matter that exists by smashing the 3-D space in which it lives (soil) to pieces. We can't see it, so we feel we can destroy it but in reality we don't need only to care about it, we need to care for it.

The evidence is there, this is what Humanity does globally: we breathe, we breed, we build. The evidence is irrefutable, exponentially increasing Methane emissions, exponentially decreasing Oxygen levels. Can you see it yet?

I don't know how strongly enough to say this: Natural Capital is there already – it needs a big helping hand to repair the damage we have already done. By destroying it, building on it and then saying we've done "net biodiversity gain" is a total lie; it's utter

rubbish. It is delusional. Our Nature based solution is Nature – we don't need to destroy it and remake it, we need to help it and yes, that is NOT putting humans or economic growth first, that I accept.
Nothing written in this document mentions countryside, farming, woodland, wetland, rivers, pools, ponds wildlife, insects, pollinators, bugs, creepy crawlies, fauna or flora. The document title is "Addressing Climate change and Biodiversity" – how can it be that none of these things (and a myriad more) are even mentioned?
Perhaps when Civil Servants and Politicians use the word "Addressing" here, the plan is to actually destroy in totality, so that it's inconvenience to "Development" and economic growth is avoided for ever.

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?

No, not by miles.
The only places to build should be places that have existing buildings which cannot be made to run carbon-zero operationally and where the sealed soil underneath them is dead already or not present.
In that case, a full LCA carbon assessment should be made to compare best-effort repair / leaving it until 2050 to demolish and rebuild. Rebuilding should always create a net-carbon-positive new building with all emissions amortised out to 2050 – that's counting everything from demolition fuel to fitted carpets, as well as finished operational emissions (including the emissions of the living residents themselves).
On top of that, building design should be modular by design to allow recycle/reuse/re-configuration after 2050 and into the future, to plan for zero waste at the End of Life.
Again, each bullet point talks only about new development – new building on countryside. The reality is that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure.
Local Government across the country and Governments across the world is just like you; using last-century economics and increasing human comfort to form yet more "new" policy without changing anything.
Think about it, if they're all like you (and to be fair, your thinking is advanced, compared to most) but think about it, if this is the best you can do, when and why will anything get better? Who is going to be the change if you here, educated, aware, democratic, comfortable - in the 1st world - won't change ... ??
[Answer:] it's not going to happen.

I accept that Wiltshire Council going against National Policy will require a battle. However, total commitment to fighting against climate change is required if humanity is going to win this struggle and a public battle between county and government will give a public stage and a national spotlight to Telling The Truth about how bad the climate and ecological crises are and how some current law and some government policy are completely wrong – they are simply making things worse. We need Non-Violent Direct Action at County level by the Political leaders to effect National change. That's extremely uncomfortable, which is why our leaders need to show Leadership and Courage.

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?

Yes, absolutely.

Again, Covid shows us how it is done. We can carry on with business as usual and all catch the virus with global catastrophic consequences (to mankind) or we can Stop, lock-down, come up with an alternative focus, re-organise, re-think and re-plan for an all-encompassing solution which might get us to a new end-goal. In reality that requires a fundamental System-Change. We can get to a position where all new development is carbon-neutral (net-Positive, actually) right now, and definitely by 2023 by halting all new development which is not part of the fight to fix the climate and the ecology until the scientific global climate measurements indicate that humanity has control of the climate and the environment. Only then, perhaps, we might be in a position to choose to trash our "Natural Capital" some more.

For instance, a big-wind turbine is a building that requires all the emissions associated with construction but the renewable energy harvested quickly pays for the LCA carbon emitted. We have no choice but to harvest energy, so we do the best we can, we compromise on Human Comfort and focus on climate repair.

Unless we take a fundamentally different approach, we will not be able to make all new development zero carbon, no. This is because business interests are embedded throughout national, local and town government – following the names of councillors through Companies House shows that the system is riddled with business interests for the purpose of development and economic wealth creation. Business is concerned with its bottom line profit. Business profit is distributed to the few and kept away from the population in order that it continues to work. The Offshore finance system provides a full set of financial instruments to convey totally secret distribution with complete anonymity to those who 'do business'. If you find any of that incredible, educate yourself.

Society currently values money, not climate, not the ecology; economic growth is Wiltshire Council's core policy. It boils down to a battle between the Planet and Money and this county is driven by money at all levels.

Cabinet have confirmed that there is no policy to request, suggest or force any developer to do a fair and reasonable Carbon Budget which considers sequestration lost and carbon emitted when an existing piece of countryside (that is both above ground and below ground) is converted to a finished furnished building, pavement and road. If the politicians are not even willing to count the real set of emissions from construction – let alone force themselves or developers to compensate for them financially with offsets – why will developers do anything other than not care? Actually, no need for a question there: the developers will continue to not care.

Cabinet have confirmed that there is no policy to request, suggest or force any developer to do a fair and reasonable Ecological Budget which considers habitat lost and lifeforms destroyed when an existing piece of countryside (that is both above ground and below ground) is converted to a finished furnished building, pavement and road. If the politicians are not even willing to count the real set of deaths from construction – let alone force themselves or developers to compensate for them financially with [I'm not sure what] – why will developers do anything other than not care? Actually, no need for a question there: the developers will continue to not care.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Yes, it could, if leadership enforced it, but No, it won't if leadership continues to choose not to.

If, for example, we took the 657 hectares of countryside that the proposed Chippenham Urban Expansion will convert into housing estate, industrial estate, roads, pavements and utilities and we estimated the inorganic and organic carbon content of the lifeforms in the soil to be 28% by volume, then carbon emissions would be around 6.5 million tonnes from the countryside conversion alone: i.e. just site preparation and soil excavation.

If we took that 6.5 million tonnes of CO₂ and forced the developer to pay the Traded CO₂ spot price (as defined by HMG in DBEIS 2019b) as £28 [2019], then the development profit would shrink by £182 million. Of course, that figure is designed to be used by industrial emitters such as incinerator plants to offset the costs of Carbon Capture, so this type of climate- and ecology-wrecking 'development' would rationally attract the Non-Traded Carbon emissions price of £69[2019] per tonne of CO₂, effecting a payment from the developer for carbon emissions of £448,500,000. Given that the developers [apparently] cannot build a £75 million road without public finance to make the scheme viable, £182m or – realistically - £448m would make the scheme unviable.

In the context of the Climate crisis and the Ecological crisis, this is exactly the correct outcome. It is little wonder therefore that the Politicians and Businessmen refuse to estimate the real Carbon and Ecological costs of this scheme.

If a realistic financial value is placed on emissions and destruction for all of the other housing estate and road schemes being planned across Wiltshire, the outcome would be the same – none of the schemes would be viable, which is exactly the correct outcome. Unfortunately, society does not yet value Carbon emissions or Ecological destruction enough to do anything about it. Money is still more important.

Alternatively, developers could 'offset' the carbon generated from the countryside destruction. For instance, if a state of the art solar farm, such as that proposed by EdenRenewables at Leigh Delamere were constructed in Wiltshire to harvest enough renewable energy to draw down the emitted 6.5 million tonnes of CO₂ from the atmosphere using state of the art Direct Air Capture plant, there would be no Net Carbon Emissions from site preparation and excavation. In this case, given it takes 1824kWh of electricity to capture one tonne of CO₂, a 60GWh/annum solar farm such as Leigh Delamere would take 198 years to generate the required electricity to draw down the emissions. So again, clearly a Net Zero new development policy would materially affect scheme viability, which is exactly the correct outcome

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The council should enforce methods that always mitigate the Climate and Ecological crises

Conceptually, it's quite simple. Every development scheme, from the massive Cabinet-sponsored estates, down to an individual's house extension should provide a realistic and fair Carbon Budget and a realistic and fair Ecological budget.

For any scheme to be endorsed and for any planning permission to be subsequently granted, the budgets must show net Carbon sequestration and net Biodiversity Gain to 2050, where separate budget lines account for every single stage of construction (or demolition) and for operation after completion and fitting.

The Council should stop funding planning of all types and focus finance and manpower instead on validating the budgets delivered by each developer. From this point on, it could lead the way nationally in constructing a realistic Carbon and Ecological materials, methods and costs database. The database should allow fair estimation of Everything involved in construction. Said database should be freely available to any developer to assist with their budgeting and supported by the council with expert guidance on best practice and updated as and when external R&D improves cost or mitigation figures.

Only through Carbon and Ecological Budgeting can both Developer and the Customer become truly aware of exactly what is the real cost to the Atmosphere/Ocean of Carbon emissions and of the real cost to the Ecology/Environment of the soft, fluffy sounding term “place shaping” and messy retrofitting. Nothing in this world comes for free.

The Carbon and Ecological budget can be balanced by designing in the required ecological and emissions performance of the target building, set to a level which will demonstrably over-compensate for the costs through it’s useful life. In the process of executing this type of budgeting, understanding of the Climate & Ecological crises by all parties will be naturally enhanced as will building design, Town and City planning.

Where a building cannot balance the true cost of both budgets, the building should not proceed.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

At the start of every utterance from the cabinet member responsible for net zero of late, I’ve heard the phrase “... in all honesty, we’re not going to make the county net zero by 2030”. Well, with that attitude and his power, he’s right and with the cancer of cabinet members who don’t believe that climate change will affect their privileged comfortable life much in evidence, we need the leader of Wiltshire Council to take a long hard look at his capabilities and either step up, or step down. At any time in my professional career had I stated that I could not achieve the task I was responsible for just 20% of the way into it, I would have been sacked. No ifs, no ands, no buts, sacked – and with very good reason. This public behaviour is totally unacceptable – even for a wannabe politician.

Let me state again: We Have No Choice but to do this work: Look at the data, extrapolate it, educate yourself, observe humanity, feel the grief, then for goodness sake, Act!

As I said above, the most important thing is to Tell the Truth to the population about how serious the crisis is. Publicise the problem, publicise the facts, publicise the retrofit and modernisation methods that can be applied to a building, publicise how life choices can reduce emissions both with and without spending money, ... there’s so much the council can do through education and believing in achieving a goal of full retrofit and modernisation of all existing buildings by 2030. Yet again, Covid shows it can be done with leadership, education and conviction; we had no virus models, no vaccine and no vaccination programme just one year ago, and now we’re 30% there in the UK & well positioned to help the world.

When did I see an email talking about climate change from WC or CTC ? You have full email lists!

When did I see Leaders giving informed webinars on climate change? You have YouTube channels!

When did I see leaflets outlining the consequences of inaction in my Ward? You have full postal lists!

Where are the case studies for the set of typical Wiltshire houses & retrofit? You have a massive web site!
Where are the mandatory CEE agenda items in each Local Government meeting? You have the power!
Where are the public Action Progress boards in each ward and the award ceremonies? You can do this!
Is it possible for a person to deploy PV on someone else's roof? No. That requires the equivalent of a Local Government ABTA scheme to cover any/all conveyancing issues at the time of sale.
Is it possible to deploy micro wind turbine power in an urban environment? No. That requires an MCS approved turbine system <3.8m² swept area and there are none on the market.
Is there a list of companies provided by Local Government to execute the work required through Green Homes Grant ? No ... or is Local Government training any significant number of unemployed people to do the work ? No.
Has the council spent millions to build over the countryside? Yes. Are it's key power players delivering economic growth by building over the countryside [yes!] or working to mitigate Climate change and Ecological destruction full time [if only!] ??
The Council needs to determine what it actually Values. If core values are still the old-age Political ones, say so, drop the greenwash and continue to get rich. If core values concern the future of the population through Civil service, then get serious on addressing climate Change and biodiversity.
There is a 5-strong team addressing Carbon reduction. That's 5 workers out of 5000 workers in total. The Ratio speaks volumes about this Local Government's core values and levels of hypocrisy when it comes to this Local Plan Policy.

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?

Fundamentally, what's missing in this document is a statement of how much harvested energy is required, this year and each year forward to

- a. Provide all electrical and heating power for Wiltshire's requirements
- b. Sequester and store CO₂ from the atmosphere, equivalent to the amount that Wiltshire emits.

Without those numbers – as cabinet well know – we can all continue to live in a haze of slight concern and avoid feelings of guilt or feel any real need to do anything. Politicians sell voter Comfort to get elected and avoid voter Discomfort at all times.
Unfortunately, to mitigate climate change, life needs to get significantly less comfortable for all, especially us high-consuming, first world types.

So, as an example, let's look at Chippenham's energy consumption figures for 2018 from the CSE: 310,000MWh. EdenRenewables' 220 Acre PV farm generates 60,000MWh annually. So Chippenham needs >1100 acres of PV farming (which is temporary, improves bio-diversity & wildlife). Instead, WC plans to sell and build over Chippenham's county farms for profit. Rather than focussing on a building strategy, WC right now should focus on a Renewable Energy Strategy for every settlement in Wiltshire. By allying harvesting to storage, Wiltshire Council could become a national leader in generation/storage if it chose to do so.

Let's take another example using Chippenham's energy usage. A 10-minute play on GlobalWindAtlas is enough to persuade anybody that Wiltshire has some of the best wind resource in the world and it's right over our heads. A few days of learning & researching shows that above Chippenham Station car park, an IEC Class3 turbine with a 150m hub height will achieve a 50% CF. Not as good as the North Sea site for sure, but it's sited at point-of-use, accessible by road and rail and not miles away in the deep sea ... which counts for a lot. Just seven Halide-X 12MW turbines at 42% CF could provide 310,000MWh annually. But you have to change the maximum turbine tip height Policy and educate the public about what will happen if we don't achieve Carbon Neutral by 2030. Rather than build over Chippenham's county farms for profit, why not site 7x turbines there, amongst PV farms? There's a High Voltage power line running right through and the pylons are 200m apart. Why not work with SSEN across the county farms to upgrade the HV line to more efficient copper cables, move it to a ground-routed system, install a sub-station to feed the grid and the town from the turbines, do some DAC sequestration, generate some hydrogen, make some synthetic fuel, recycle all waste plastic types and remove the pylons to help with the view?

Don't be taken in by HMG Rhetoric: look at the reality of Grid Carbon Intensity in our Southern Region – when the sun doesn't shine, we're powered by CCS Gas. Read the BEIS Energy Policy which is to empty the UKCS of Oil & Gas before 2050. See Dukes and understand that we don't count the 'biofuel' CO2 emissions of our biggest power station – Drax – or any other biofuel plant. We don't count the CO2 from Incinerators, yet we push EVs ... why? ... because Grid electricity is a massive market for Gas. We must recognise that our National Politicians do not intend to change on account of the climate, they are driven by money.

So, for Wiltshire to “decarbonise Energy Production, Consumption and Emissions”, you, Wiltshire Council, are missing an entire team and your aspirations for Energy Harvesting and Green Economic Growth are orders of magnitude too low. Alongside the Carbon reduction team, WC require an Energy Harvesting Team. Both teams need the full, A-Political backing and full-time support of each and every cabinet member and the leader of the council. Our WC 'leaders' need to assess what they value – is it money or is it a future?

When it comes to renewable energy harvesting, the choice for the population of Wiltshire really is between a view and a future. Our leaders can continue to live doggedly in the past or they can work hard to be heroes for a future.

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

Not only should Wiltshire Council encourage all technologies through Policy and active facilitation and capture of grant monies, it should get active and help in the deployment of renewable energy harvesting of its own accord, with its own budget and strive to become best-in-class experts and achieve on time on budget delivery. That's called Green Economic Growth and it does not have to be left to the Private Sector.

The problem with the Climate is absolutely massive. The CO2 problem is so big in fact, it's Planetary in size. The only things humanity has to fix the existing climate problem are Harvested Energy and Ingenuity. In the UK, we are highly educated and world class in R&D, design and engineering. Consider the challenges faced by other more disadvantaged countries, such as, say, India. Are they going to be able to engineer sufficient sequestration in time? No. So that means – if we want to avoid climate tipping points – we have to do what is required, no matter how economically fair that seems.

Again, is there any idea amongst the politicians as to how big the problem is globally? Consider the 43 billion tonnes of CO2 humanity emits annually into the atmosphere. What do we have to engineer to draw down that amount of pollution every year and then de-insulate our atmosphere so the planet stops relentlessly warming up?

Well, if we use DAC Sequestration technology we would need over 3000 Hinkley-C type Nuclear power stations or 1.2 million Offshore wind turbines, or 1.2 million square kilometres of PV to generate that power, and that's just to do the CO2 draw down. Nothing to do with running our economy or keeping us comfortable, warm and fed, that's just to extract the CO2 we emit. And remember, for every tonne sequestered from the air, a free tonne is adsorbed by the ocean, so to lower the ppm of the atmosphere, twice as much effort is required. On top of that, it takes energy to actually do something with 43 billion tonnes of CO2 drawn down. Be worried, be very worried.

However, we have vast renewable energy resources in our country. We have vast engineering capabilities. We have vast influence around the world over huge areas of land and business from previous pillage. Why not make Wiltshire a power house to focus national use of all of our resources? The wealth in Wiltshire is immense, we just need to enlighten the wealthy about how urgently they need to put their money to work for something other than their own comfort.

So don't ask should we support all technologies – get out there and deploy them with maximum commitment and maximum effort.

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?

It is imperative for the Wiltshire population to see, at least annually, the amount of energy we have consumed and the amount of harvested energy we have generated. The key in Agile methodology is to fail fast and learn fast. By sharing the magnitude of the failure with the population on a regular basis and by regularly explaining the consequences of continued failure, the population will engage.

Yet again, the Covid shows us that this is a very useful technique to change mass population behaviour. By publishing the daily case rate, the hospitalisation rate and the death rate, the population engaged with the Covid problem and behaviour changed to address the problem.

I expect that the CSE can provide energy consumption figures for Wiltshire alongside renewable energy generation figures for Wiltshire to get Wiltshire Council started on collating and presenting this data itself. The Scatter methodology can provide true CO2 emissions figures (as in: figures that include international travel and goods from abroad) for the county and figures exist for the energy required for CO2 sequestration, both DAC and CCS. Figures can then be generated regularly and published (e.g. on BBC Points West, as are the Covid Cases per 100,000 currently, per Local authority).

Figures should show the delta between year-to-date "Human Comfort" generation/use and between the energy required to sequester year-to-date CO2 emissions and the energy used to sequester CO2.

These figures will be truly awful and that just might be enough to generate full public support for the Climate Emergency state which the entire country needs to be in, to make the required progress.

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?

This is a favourite point of diversion from a particular cabinet minister. I'm sure I've heard him say that this type of house accounts for 6% of the housing stock in Wiltshire and then phili-buster on and on and on about how really hard it is to make those houses carbon neutral. So, let's set those aside in this discussion and address the 94% of buildings that are fully suitable for retro-fit.

During the period of retrofit of the 94%, extra time can be taken to determine as gentle and complementary an approach to retrofitting the 6% as possible.

The key first step in retrofit is insulation. It is 100% better not to use energy for space heating at all, rather than to burn Gas to heat it. The EPC system and the Green Grants system should therefore continue and be actively supported and pushed by this council. Insulation is key – loft, wall, double glazed windows, window and door seals. Rather than spending £ millions planning roads and housing estates WC should retrain the personnel to execute free thermal imaging surveys on EVERY building, such as those offered by the Cheese project. Such a survey, allied to an EPC certificate will give every householder and business owner a very good idea of what's wrong, thermally, and what to fix first, through insulation.

Next, let's exclude biomass pellets from this discussion. The generation of biomass pellets is NOT sustainable as can be clearly seen in this exposé. Again, we see how this Government's policy of deliberately not counting CO2 emissions protects big business and allows UK companies to act just like Bolsonaro in Brazil, just for profit.

I've previously discussed micro-wind generation which is completely blocked by MCS certification/red tape. MCS is a Government Charity (whatever that is!) and allows HMG to wax lyrical about the benefits of wind power whilst disallowing it onshore where it's needed, to protect the O&G market.

That leaves ASHP, GSHP and PV.

Start with Business: The most cost-effective/efficient roof spaces to retro-fit with PV or to install ASHP or GSHP are the large business and farm buildings. These consumers use vast amounts of energy, many of them 24/7. Have I ever heard WC discuss shaming our supermarkets or commercial landlords into fitting PV on their roof space and car-parks? Never. These are the super-users, they have the money, the tax breaks, the space and their own maintenance engineers, so get on and target them in earnest ...HMG just put up £Billions for Business investment WC should stand up and publically shame them for total inaction – another job those WC housing estate and road planners could be doing.

For any house that can fit PV, PV should be fitted. We now have 460W panels, so East/West roofs are as suitable as South roofs. A 4kWpk system should cost well under £5K fully fitted with a £ payback period under 10 years and a CO2 payback period of < 2 years. There are millions of unemployed currently who should have been trained to install these – what total HMG ineptitude to pay millions to do nothing during furlough – utter incompetence. Furthermore, the Policy to limit generation to 3.9kWh per household needs to be fixed. Yes, that may require some investment but the limit is essentially Gas market protectionism.

WC needs to implement a well-published policy, whereby Business and Home rates attract an extra annual escalating payment, if no renewable energy is installed at a property. This payment should be multiplied by a significant factor if the insulation improvements shown by EPC/Cheese are not implemented. The furore that would be generated via this policy should be used as a platform to the public and business communities to get the message out that there is a Climate Crisis, that everybody needs to Act and that Wiltshire Council are taking the lead in making that happen.

Finally, there is no problem with retro-fitting conservation buildings. Attic insulation – no problem. Windows – 3/6/3 Argon DGU in 17mm-rebated wooden frames/doors – no problem. Superfoil 6mm and 22mm insulated plasterboard for all internal walls – no problem. 18mm retro-fit UFH heating – no problem. GSHP or ASHP in their [usually] larger-than-modern gardens – no problem. It's all totally do-able.

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?

This graph shows Human Population since 1800AD. The root cause of the climate crisis and of the ecological crisis is that there are too many humans on this planet.

The clearest explanation of what our global human population has done and is continuing to do to Nature and to our Planet is given in this short but clinically precise YouTube clip.

Even though we have the science, the facts & figures and the Advocates to speak out against the destruction of our natural capital and have been doing so for over forty years, our political leaders and media channels are not listening and are resolutely and manifestly not Acting on either crisis.

This entire Local Plan process is the perfect example – it is ridden through with a single purpose, which is to Build, Build, Build in order to drive economic growth. That's not a plan for where humanity stands right now – it's a plan that makes everything worse. Democratic Political leaders could never have a discussion about reducing the size of the global population. Political leaders could never publically discuss the self-bestowed primacy of humans. Religious leaders could never countenance discussing an alternative to Man having dominion over the entire animal kingdom (and women) .. and these people are our leaders, with huge vested interests. They would rather go to war than discuss these subjects. But this is exactly the type of hard, ethical discussion that a Citizens Assembly could and should handle and generate policy that governments enact.

So how do you control the numbers in an exponentially growing population, particularly in a democratic first world society where we all demand rights to consume as much of anything and everything as we can afford?

What is the vaccination Mother Nature could apply to fairly control her Virus before it kills her – Air Pollution maybe ?

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?

Anything and everything; change WC core strategy of endless road building and get radical alongside climate and ecological education for the population

The first problem is the mentality of WC leadership. Their core strategy for decades has been to build roads in the belief that it drives Economic Growth. Infrastructure is huge cost, high employment (though not for Wiltshire people) and huge wealth diversion - via third party companies – from the public purse to the business leaders. The core aim is to turn the A350 into a road similar to the A34 from Poole to the M4.

In order to populate the new roads with vehicles, WC need to generate vast amounts of commuter traffic and route it directly onto the A350. This is the purpose of the distributor roads around Chippenham and Melksham – the more traffic, the better the case for trashing more countryside (for profit) with a bigger A350. The more houses that feed the distributor roads via a cancer of housing estate roads over the countryside, the better for our cabinet members' road building strategy.

So the 1st policy step in any plan that benefits Local People is to remove the road and wealth-loving personnel from positions of Local Government power. Unfortunately the system, as well as the mind-set of the leaders is from the last century and it is unfit to tackle the Climate and Ecological Crises.

Most of us, the Wiltshire population, derive massive human comfort from our cars. Walk around the housing estates and look – some households practically deify them, conferring entire house frontage and internal house space to displaying them and publically caressing them, not to mention working all hours to service the credit costs and maintenance costs they bring.

Politicians know that to take away Human Comfort associated with our beloved cars will get them voted out. They do not have the courage or the balls to do the right thing on transport and they never will.

So the 2nd policy step that is required is to hand over this entire problem to a Citizens Assembly and force the Politicians to enact the policy decisions that come out of a citizens assembly – and be held accountable if they are not implemented. There are hundreds of ideas, both carrot and stick, to fix this problem, but the population first needs to be educated on why we need to abandon our cars and what Climate change, food scarcity, mass migration and extreme weather will do to our society if we don't.

Finally, on EVs in Wiltshire. I'll say it again, if the sun's not shining, our electricity in Wiltshire is generated by Gas. We have next to no wind. In fact, because we are not yet a 100% renewables grid, all year round, when we demand an extra kWh from the grid, we burn 3kWh's worth of Gas to generate it –see Dukes 2019 flow chart (Page 2 of this document). The reality is that if you charge your EV from the grid, here in Wiltshire, your EV system uses more CO2 per mile than a modern diesel car.

Not a popular thing to point out, but that's the current reality. So a huge opportunity for WC to publicise this information, run all county chargers from PV, Hydro or GSHP (yes, it is possible) and promote every household getting renewable energy harvesting installed ASAP.

Finally, the real message that we will need to digest as a society is DON'T USE YOUR CAR unless it's to work against the Climate or Ecological crises. The greenest, lowest carbon footprint car is the one that's never used.

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?

Having been on a number of DNO stakeholder workshops and followed through with discussions on how to address this particular issue, the reality is that HMG Policy controls DNO investment in its own Grid Network via the Regulator OfGEM. OfGEM is the Government's regulator for both Gas and Electricity markets, er, yes, both ... at the same time, Gas and electricity. The Government's policy is to subsidise Oil & Gas (from the public purse) to ensure that it completely empties the UK's Oil and Gas Continental Shelf reserves before 2050 – this is the current BEIS Energy Policy. The Oil and Gas industries are the most profitable businesses that have ever existed throughout human history and they control the UK HMG Energy Policy and to a large extent, the UK Climate Change R&D budget of £8-£12Bn.

By sequestering Offshore Wind through HMG's Climate Change R&D budget, O&G gets the public to pay the industry to "green up" it's flaring and gas-powered extraction equipment with harvested North Sea wind power. Harvested Power that will not be directed to the UK consumer.

By sequestering CCUS through HMG's Climate Change R&D budget O&G gets the public to pay the industry to draw-down CO₂, which it then pumps into 'unviable' oil and gas wells to extract previously inaccessible O&G using the banner of "carbon capture and underground storage" and also to ensure maximum yield from ongoing wells.

OfGEM limits the % of consumer revenue that the UK Grid DNOs are allowed to invest in their section of the UK Grid. It does this precisely to prevent the DNOs from improving the grid too much, too fast. This includes preventing the DNOs from leveraging their customer revenue to get the £Billion of loans required to do the work from available sources such as the European Green Bank. HMG, controlled by O&G, has no intention of removing the electricity generation market for Gas until it has burned through the UKCS reserves.

If you review the price difference between Gas and Electricity per kWh from our Electricity/Gas suppliers, you'll see electricity is around 7x more expensive than Gas. HMG Policy as set by O&G business is to add the cost of renewables to the electricity price, in order to preserve the Gas market. The Queen owns all rights to extraction of anything above and below the UK land area and 200miles out to sea. The only rule the Crown currently places on the licensees who extract Oil and Gas from the Sovereign estate is that they exact maximum economic benefit from extracting the reserves. No rules on Climate Change or Ecological damage.

In this particular case, where HMG and the Crown are controlled by the entire O&G business, backed by huge past wealth and immense future wealth, Wiltshire Council will be totally ineffective. So, much better to spend time and resource insulating Housing and Business buildings than fighting pure, unadulterated, planet-killing power.

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?

I think I answers that fairly fully in the responses above, particularly in question A2.

We need to stop all new construction on countryside immediately. All brownfield or urban regeneration construction should only proceed if it's LCA generates positive Carbon and Ecological outcomes before 2050. This was fully discussed in question B4

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

This paper is entitled "Addressing Climate Change and Biodiversity Net Gain" and I was expecting to find a Plan for the huge Wiltshire Budget that addressed climate change and biodiversity net gain. I have found absolutely nothing of the sort.

This is a document that discusses construction and very nearly only construction and attempts to greenwash over the massive carbon emissions and the massive environmental destruction that the construction industry creates daily.

I am disgusted that the developers, in collusion with our political 'leaders' can only think about building housing estates and roads, when the climate is broken and nature is becoming increasingly extinct.

I am extremely disappointed that the council officers who moderated the meetings and these documents are professionally propagating the plan to destroy vast swathes of Wiltshire. You do have a choice, you know.

You people should be utterly ashamed of yourselves and I hope your offspring have already told you exactly why. But it's not too late (I hope). You could educate yourselves thoroughly on the causes and up-coming effects of both of these crises – there are plenty of links above to get you started. There are county-level methods already in existence that will allow you all to immediately start to do the right thing professionally, as a councillor or an officer.

Perhaps the most important thing is to research and read, then decide for yourself when the Planet will reach its first Climate Tipping Point. Remember, Humanity has made absolutely no progress at all on mitigating climate change to date – and you're working for People who are planning to make it worse.

My worst-case scenario is a 0.5C rise through the next 15 years, triggering 500,000,000 people to migrate North due to food shortages caused by droughts and floods. Wiltshire has already seen a 1.69°C rise since 1960 which has indeed caused crop yield issues here in Wiltshire. Already, the weather isn't like it used to be. As a minimum, a good Plan has to detail Actions that avoid a worst case scenario. This plan does not.

When you feel an overwhelming grief at some point in your learning, you've learnt enough about what's already happened. You then have the task of working out how best you personally can use the talents you have to make a big difference, whilst minimising your own household carbon footprint and maximising you household ecological assistance.

Good Luck, the work needed is not easy and it's not comfortable.

See [Climate154] for links within text.

Rep ID: Climate155	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): D2 Planning Limited
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Vistry Homes Limited (part of Vistry Group)	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: N/a
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?	
<p>Vistry Homes note the Council's commitment and response to the Climate Emergency and support steps to mitigate the impact of climate change. However, it is unrealistic to assume that the Local Plan can deliver outcomes that can significantly reverse existing carbon emission trends before 2030. The Council must assess whether it can reasonably achieve a step change in carbon emissions ahead of the government's road map – which seeks to achieve carbon zero development by 2050. Cost impact on viability, affects land price, therefore affects land availability, restricting</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

We agree that the Local Plan presents an opportunity to influence the pattern and form of future development and create a shift towards sustainable modes of transport. Whilst de-carbonising existing building stock is an important component, it is essential that the Council does not set carbon targets for new build development that undermine the delivery of it's housing requirement and the spatial strategy for delivering that requirement. Doing so would have significant economic and social implications across Wiltshire, including worsening affordability. The Council should therefore be cautious about the development industry's ability to respond to untested targets running ahead of the government's road map.

A3: How should these actions be delivered and measured?

Actions should be delivered and measured with reference to the government's road map to reducing emissions

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

Yes - Vistry is supportive of the continued use of Sustainable Drainage Systems (SuDS) within planned development schemes. The standards sought in respect of runoff should be in accordance with the Environment Agency's national requirements. Where practical, we support the principle of SuDS being a multifunctional space, potentially part of wider green and blue infrastructure, that has local benefits including those relating to biodiversity potential. As currently drafted, the Council's strategy states that 'all new development should utilise and where necessary create natural flood management measures'. Vistry suggests that this may not be achievable on all sites and that the Council should maintain some flexibility in this regard where there may be alternative ways of achieving sustainable water management. We also note the suggestion that 'all new development should be designed in a manner that limits the daily consumption and disposal of water'. Whilst the benefits of reduce water usage are recognised this is partly a behavioural matter for occupants and cannot be stipulated by developers. It would also potentially be inequitable on the basis that similar restrictions were not imposed on occupiers of existing housing stock.

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?

Yes – it is considered reasonable to propose a minimum 10% biodiversity net gain – on or off site - which is in line with emerging legislation (Environment Bill). It should be recognised that achieving that level of net gain on a small development site can be challenging and so off-site mitigation should be acceptable. The Council’s aspiration for development to be ‘ambitious’ in enhancing and creating new GBI assets must be accompanied by a consideration of a site’s constraints and opportunities which inform both its capacity and viability.

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?

Vistry broadly support the Council’s intentions in this regard and note specifically bullet four of Policy Theme 3 which states ‘...such standards would need to be clear, easily implemented and not put at risk the viability of development’. As drafted it is considered that the Council’s intentions are slightly ambiguous in this regard as it not currently realistic to assume that all new development can be ‘designed to achieve net zero carbon standards and seek to minimise embodied carbon’ at scale at the current time.

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?

No - it is not considered achievable. The Homes Builders Federation is engaging with the government and the development industry in respect of a Future Homes Task Force. This is very much a work in progress in to support the implementation of the Future Homes Standard, which in itself is a step change in terms of improved performance. The Council introducing a blanket requirement ahead of a wider industry response (relating also to its supply chain, training, and skills) puts Wiltshire at a real risk of failing to deliver the number of market and affordable homes it needs. Vistry suggests that any deviation from the Government’s proposed route map should be strongly evidenced, including an assessment of viability.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Vistry consider that a negative impact on scheme viability is likely. Not only may it result in a lag in the delivery of new homes whilst technologies and supply chains are explored, such homes are likely to be more expensive to build. As set out in respect of Question B4 the development industry is taking pro-active steps and engaging with a cross-sector initiatives such as the Future Homes Task Force, but implementing net zero at scale is not currently achievable without an impact on scheme viability. The Council should take this into consideration when setting standards to ensure that delivery is not compromised.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Vistry is supportive in principle of the Government's proposed Future Homes Standard but as set out above, would encourage the Council to consider the timing of the introduction of any standards which are potentially ahead of the Government's national route map.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Yes - it is considered appropriate for the Council to support the decarbonisation and modification of existing building stock so that it can make a proportionate contribution to carbon emissions reduction.

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?

We would encourage the Council to take a flexible approach to sustainable energy generation and management recognising that a one-size fits all approach will not be appropriate on all sites. Site specific proposals should be considered on their merits.

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

We would encourage the Council to take a flexible approach, encouraging all technologies – recognising that these may change and develop over the duration of a Local Plan period.

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?

Targets should be applied sensitively taking into account other site specific considerations in order not to become a barrier to viable development.

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?

N/a

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?

We support the Council's acknowledgement that increasing the level of self-containment within Wiltshire's settlements offers the best solution for tackling unsustainable, carbon-based travel patterns. The settlement hierarchy is relevant in this regard and development should be directed to the most sustainable locations. This may require the Local Authority to accept that some inherently sustainable sites are located within the Green Belt and should be considered for development.

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?

Vistry support aspirations to support modal shift and note this is best achieved at scale at the most sustainable settlements. In respect of any future policies relating to electric vehicle infrastructure including any charging points associated with new development, the Council should consider the significant impact that this can have upon utilities capacity. Any policies should also acknowledge that EV 'ready' homes (i.e. with the cabling installed) are inherently more flexible than demanding the installation of the charging infrastructure – given the variety of options current open to consumers.

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?

Vistry welcomes the Council's acknowledgement that electric vehicle infrastructure places significant demands on utility capacity. It is essential that any discussions with operators consider the quantum and timing of infrastructure to be provided and the potential implications in terms of major reinforcements and upgrades.

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?

See Vistry's response to Question B5. The impacts are potential far reaching and must be considered in more detail ahead of becoming policy requirements. The Council should take this into consideration when setting standards to ensure that housing delivery is not compromised.

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

We would encourage the Council to explore the ambitions and commitments being brought forward by the Future Homes Task Force to understand the scale of the change that will be required to achieve the government's roadmap.

Rep ID: Climate156	
Consultee code: Other	Consultee Organisation (if applicable): Wiltshire Climate Alliance
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate156
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?	
<p>Yes, it is reasonable to expect the Local Plan to deliver carbon reduction outcomes in line with the national net zero target, with sustainable housing numbers in the right locations, backed up by polices that require net zero carbon development and sustainable construction and promote investment in renewable energy generation. In fact, it is a requirement of planning legislation and the NPPF that local plans are aligned with the Climate Change Act and the Government's net zero carbon by 2050, and 68% reduction (on a 1990 emissions baseline) by 2030, national target. This is a clear legal duty under Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to, climate change. In other words, Wiltshire's Local Plan not only has to "deliver outcomes that significantly reverse existing carbon emission trends before 2030" but needs to (as a minimum) align (and demonstrate this alignment) with these national targets.</p>	

In doing so, it will need to plan for genuinely sustainable development that is located so as to preserve carbon sinks, avoid climate damaging infrastructure and remove, rather than increase, reliance on commuting and private car dependency. It will also need to introduce net zero carbon development policies, to ensure there are no emissions and potentially negative emissions, associated with all new spatial development, which will have the added benefit of removing the need for costly retrofit in years to come. Wiltshire Council would do well to be guided by the letter it received from Client Earth in 2019 and the Climate Emergency Task Group's recommendations endorsed by Wiltshire Council's Environmental Select Committee In January 2021. There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of adopting such policies, including in reports such as The Cost of Carbon reduction in New Buildings (CSE, 2018). Moreover, determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. Planning Practice Guidance sets out useful sources of evidence such as national data on local greenhouse gas emissions and provides sources of evidence of how future patterns of spatial development can be designed to maximise carbon reduction potential by, for example, reducing the need to travel.

The requirement to deliver genuinely sustainable development through Local Plans will ramp up significantly in coming years and there is already evidence of the need for major infrastructure planning decisions to take account of the UK's legally binding obligations in relation to proposed expansion of airports (Heathrow and Bristol) and more recently England's road network, which has been called into question following the revelation of documents showing the transport secretary, Grant Shapps, overrode official advice to review Government policy on environmental grounds. The signs are that the Government is beginning to prepare to put its policy and public spending proposals through a net zero filter, which is exactly what Wiltshire Council needs to do in relation to the Local Plan.

With regards other aspects of land use; no attempt seems to have been made to assess the value of existing farms, their contributions to public benefit or their future potential in the Plan period. This serious shortcoming is embedded in the construction and application of the site selection criteria. For the 'preferred sites' for Chippenham, for example, the Interim Sustainability Appraisal (Section 5.2.5) simply comments that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality," ignoring the fact that there is a significant amount of Grade 2 and 3A (the Best and Most Versatile) land. Similarly, there is no consideration of farmland (or its use for local food production, tree planting or renewable energy generation) as an alternative or any value placed on the loss of such. Neither is its value considered in terms minimising vulnerability to surface water flooding or locally valued landscapes, or in relation to the landscape aim to "conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place" and 'minimise the impact on locally valued landscapes'.

Well managed farmland with community connections also has the capacity to contribute positively to achieving carbon reduction targets as well as "healthy and inclusive communities," but this seems to be neither recognised nor evaluated. The lack of

attention to the current and future benefits of farming and the costs of its loss is further exemplified in the Empowering Rural Communities document, in which the words “farm” and “farming” are completely absent. This lack of attention to the value and negative impact of potential farmland loss is a serious weakness in the land use policies which underpin the site selection process and conclusions. Moreover this is contrary to the expectations of para 170 of the NPPF which states that “Planning policies and decisions should contribute to and enhance the natural and local environment by...(b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

All of the above underlines the unspecified and hence unaccountable balance of qualitative judgements and evidence acknowledged contained within the Interim Sustainability Appraisal, which is seriously deficient, yet used to as a justification of the site selections put forward in the Spatial Strategy.

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

Despite warm words in its Local Plan climate change paper, and its Climate Emergency declaration in which the Council committed to seek to decarbonise the county, Wiltshire Council’s current Local Plan proposals would substantially increase the county’s carbon emissions and lock in emissions for years to come (i.e. precisely the opposite). To deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to reduce car dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

Taking Chippenham as an example, this would mean an employment led plan that radically reduced the need for additional commuting. It would mean abandoning a spatial strategy that simply encourages relocation from other settlements along the M4 corridor, and further embeds dependency on commuting. It would mean reducing housing numbers to genuinely met local needs, and certainly not further exceeding current levels of growth (which are already based on in-migration). In Chippenham, for example, growth is predicted at 250-300 people per annum by the Office for National Statistics (ONS), which equates to 2,500 houses (at most), rather than the 9,225 currently being proposed, for the 20 year period to 2036. However, given that none of the 26ha of employment land current Plan Period (2006-2026) has yet been built on, it would be better to hold back on further housing development until employment sites are built upon and local employment opportunities are available. This would also have the advantage of not requiring an extensive distributor road with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a massive associated carbon footprint. Neither would

there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, would have effect of reducing commuting and private car dependency. More innovative approaches to public transport, including rail (e.g. new stations at Devizes, Corsham and potentially Hullavington) would help reduce the need for remaining necessary longer journeys by road. Genuinely sustainable transport policies, promoting investment in active travel and electric vehicle charging infrastructure, would help reduce emissions from shorter journeys in and around the local area. Net zero carbon development policies, and related policies to promote local renewable energy generation, of the type being put forward by the Chippenham Neighbourhood Plan, would mean no additional emissions for the development itself.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and net zero carbon development/ sustainable construction/ renewable energy promotion/ sustainable transport policies such as the ones highlighted above and recommended by the Climate Emergency Task Group. These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government's and Wiltshire Council's carbon reduction targets.

The Local Plan itself should establish its carbon reduction potential and targets for net zero carbon development (as recommended by Client Earth), including preventing emissions being generated as a result of:

- destruction of natural capital and removal of carbon sinks;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport mileage as a result of car dependency and commuting;
- operational emissions resulting from new housing and business/ industrial premises;

and avoiding emissions as a result of:

- local employment led development;
- highest possible standards of building insulation (for domestic and commercial);
- integrated and stand-alone renewable energy generation;
- innovative and progressive farming methods;
- investment in infrastructure to support active travel (for short journeys) and public transport;
- investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites at the outset. No sites should be designated as 'preferred' until such time as the climate change implications (including estimated tonnes of carbon emissions) have been calculated.

A means of monitoring the implementation of the Plan policies that drive the carbon reduction should be established alongside the Plan.

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

As stated in the Interim Sustainability Appraisal report, flood risk will be exacerbated by climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk of flooding elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage Scheme (SUDS) solutions to mitigate flood risk that is avoidable in the spatial strategy in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

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?

The question is based on a false premise, since natural capital would not be enhanced by any of the proposed development, and would be spectacularly damaged in many of the spatial strategy's proposed site locations, including wiping out some huge areas

such as the Avon and Marden valley to the East and South of Chippenham. Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the scale of the loss of natural capital caused. It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from aspirational statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed spatial strategy would destroy. The question seems disingenuous in that successfully enhancing natural capital requires that it isn't destroyed in the first place. Hence, lower, more sustainably located housing numbers would help avoid building on valuable habitats and carbon sinks, such as the Avon and Marden valley and land surrounding Bradford on Avon. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state. In terms of how to limit the destruction of natural capital that the spatial strategy would destroy; a starting point would be to estimate the value of natural capital that would be lost on the proposed sites so as to be transparent about the damage to the climate and environment that would result if the current Plan proposals were implemented. This would support the case for lower numbers of houses, less hard infrastructure intensive development and selection of sites on which the destruction can be limited.

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?

No. The adoption of policies that require net zero carbon development in line with the UK Green Building Council (UKGBC) approach, and as other LPAs are including in their plans, and the promotion of renewable energy generation (e.g. on Council land and County farms) will be essential. However, these are necessary but not sufficient and their benefits would be wiped out completely by an unsustainable spatial strategy that substantially increased emissions by:

- release of huge quantities of carbon through the excavation of rich organic soils;
- removal of carbon sinks that would otherwise continue to lock in and further sequester carbon in future;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport emissions as a result of new commuter extensions.

In other words, planning for net zero requires both sustainable housing numbers, a sustainable spatial strategy and sustainable (net zero development and renewable energy generation) policies, to have any chance of meeting the Government and Wiltshire's net zero targets.

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?

It is possible to have a net zero carbon development policy that would ensure net zero operational emissions for all the allocated sites in the Local Plan, as is already the case for some adopted Local Plans and other LPAs are doing in their emerging plans. This should be backed up by strong sustainable (low carbon) construction and renewable energy generation policies. These policies will not, however, prevent the destruction of carbon sinks or require the lost sequestration is compensated. Neither will they prevent the transport emissions that results from poor spatial planning and place shaping, the negative effects of which could wipe out the positive effects of such policies.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. There is considerable evidence for the viability net zero carbon development polices in Local Plans (please refer to the Centre for Sustainable Energy for examples and background papers). The need for net zero carbon development is set to increase in future, as the Government requires planning decisions to prioritise climate change considerations. Viability will become a secondary issue as policy and legislative requirements ramp up. Once net zero carbon development policies become more mainstream, additional cost will no longer be material. Developers claims that they can't afford to develop sites to net zero should be taken with a pinch of salt. It is no longer a choice in any case.

Overall, Wiltshire Council needs to worry less about viability, accept the inevitable changes that are coming and focus on:

- developing a carbon neutral spatial strategy;
- putting a robust net zero carbon development policy in place;
- actively promoting renewable energy development, including on its own farms (and using these for food production/ tree planting and renewable energy generation rather than selling for short-term financial gain);
- putting policies in place to promote the transition to ultra-low emission vehicles (waking up to the fact that electric vehicles as will be the norm by the end of the Plan period).

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which several leading local authorities are already doing through their local plan policies. This includes Plans that have already gone through Examination and been adopted, such as the London Plan.

In addition to decarbonising its spatial strategy, the Council needs to put in place a policy that requires all development be net zero-carbon, in line with the UK Green Building Council's Net Zero Carbon Buildings Framework Definition. This would require all development to achieve an annual operational net zero carbon emissions balance by:

- prioritising energy efficiency through the building fabric;
- reducing the remaining energy demand through on-site renewable energy and heat (e.g., rooftop solar PV and/ or air or ground source heat pumps); and
- compensating for the residual carbon emissions via a carbon offset fund, into which developers are required to pay a value agreed at the application stage, to deliver carbon savings which would not otherwise have been made (ensuring additionality).

The Building Research Establishment's BREEAM offers a range of sustainability assessment methods and standards for masterplanning projects, infrastructure and buildings from new construction to in-use and refurbishment, which can be used in guidance to supplement an overarching net zero development policy in relation to individual (particularly commercial) buildings.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This could be done via a policy to support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements, although this would make a small difference in terms of overall impact. It is unclear what the Local Plan could do, if anything, to promote the retrofit of existing buildings, which needs to be a priority for Wiltshire Council to address, and would make a substantial difference in terms of reducing carbon emissions.

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?

The key element that is missing (in so far as it isn't even raised or has any questions on) is the overarching proposed housing numbers and spatial strategy. Other Local Plan policies could be regarded as sticking plasters for a strategy that imposes an out-dated model of in-migration, car dependency and the destruction of natural capital, carbon sinks and productive farm land, all of which are critical to reaching net zero and preventing devastating climate change. It has already been established that the proposed excessive housing numbers bear no relation to local housing need or can be supported by local employment, which would allow people to not to have to commute. In other words, the entire Plan is based on an unsustainable approach that sets itself up to fail in terms of carbon reduction and the Government's and Wiltshire's net zero targets.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e. at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Once the Plan has begun to address the fundamental issues above, it almost goes without saying that its Local Plan policies need to ensure emissions from any development that takes place are neutral or negative.

Planning policies should require that:

- all development (housing and commercial) is required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset through off-site renewable energy generation for any remaining operational emissions) as soon as possible;
- promote renewable energy generation, such as solar and wind on suitable sites, identifying Wiltshire Council land (including sites within farms/ County Farms) to contribute (e.g. through Local Plan Development Orders) and working closely with Neighbourhood Plans in identifying other locally preferred, suitable sites;
- sustainable (low carbon) construction, including embedded carbon in materials such as concrete, aggregates, plasterboard and tarmac, procurement of products and services involved in construction and the transport and on-site activities associated with the construction itself;
- Planning policies should stop any further installation of natural gas for heating and cooking ahead of it being completely phased out in new homes from 2025 and support the transition to renewable heat such as air and ground source heat pumps;

• require the installation of EV charging infrastructure in anticipation of the cessation of petrol and diesel vehicle sales from 2032 and the transition to EVs over the course of the Plan period;

• set water efficiency standards to help reduce emissions from energy used in pumping.

The carbon emissions associated with the emerging Spatial Strategy should be calculated in advance, including the emissions associated with different site options, to enable a transparent planning process and informed decisions to be made about housing numbers and potential development site locations.

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. This would allow for future innovation and adaptable approaches, which could help a faster transition to net zero. Working with communities, including for example community energy organisations, will be an important aspect, helping to ensure renewable energy generation is suitably located and recycling benefits directly back into the local economy/ community.

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?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system supports the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.”

The Local Plan should therefore set a net zero target based on an assessment of its carbon reduction potential and develop policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside a genuinely sustainable Spatial Strategy and carbon neutral development policies. Separate interim targets could be set for the generation of renewable energy during the Plan period, consistent with the overall net zero target.

These would need to be ambitious and regularly reviewed, since early investment/ front end loading will be critical given the amount of time it takes to develop proposals and the planning application process. In other words, the net zero target will be

much more achievable if emissions reductions begin early and the large scale investments needed are delivered in the early part of the Plan period.

Measuring progress will also be important and will require a baseline and means of updating. This should be relatively easy in relation to any significant 'ground mounted' renewable energy generation sites. Whilst more challenging to keep track of domestic and commercial renewable energy and heat generation, there are an increasing number of more sophisticated tools that can be used, such as the community-scale carbon footprint tool developed by the Centre for Sustainable Energy and Exeter University.

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?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy generation. This includes in conservation areas and listed buildings, providing they are sympathetic to their setting and significance but enhancements could be made to the latter. The main imperative for Wiltshire Council is to promote retrofit of existing buildings throughout the county, which is beyond the scope of the Local Plan to influence as far as we are aware. The Local Plan priority should be on sustainable housing numbers in sustainable locations that don't destroy carbon sinks and promote commuting, backed up with net zero carbon development, sustainable construction and renewable energy policies, including LDOs for suitable Wiltshire Council farms, such as the ones in Chippenham.

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?

The paper states that "the Council considers that increasing the level of self-containment within Wiltshire's settlements offers the best solution for tackling unsustainable, carbon-based travel patterns." It further states that "to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles." Despite this, its spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution, as a result of increased commuting and localised travel for many years to come.

A more organic growth/ local employment-led development approach, with supporting policies, would prevent large scale commuting and associated air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work, thus reducing air pollution associated with a daily commute. This is particularly acute in towns like Chippenham and Melksham where thousands of vehicles drive through all parts of the town to the A350 and up to the M4 and onwards to their places of employment, contributing substantially to air pollution at peak periods, which also coincide with children walking to school and breathing in the NOx gases and particulates.

The currently proposed excessive housing numbers and spatial strategy would simply add to this air pollution and damage to young people's health, as well as creating even more air pollution in town centres, as a result of all the additional vehicles associated with the urban extensions. Taking Chippenham as an example, the 7,500+ houses and associated suburbs to be built in open countryside, resulting from the HIF funded road bid dictating the spatial strategy, would generate potentially 15,000 more cars and vans, the vast majority of which would drive into Chippenham or Calne to access shops and services, creating even more air pollution and the need for Air Quality Management Areas (AQMAs) in both settlements. We already see this pattern in the most recently built estates at Cepen Park North and Cepen Park South, with no reliable regular bus services to offer any alternative, and few people cycling into town. The air pollution caused would run counter to Wiltshire Council's own Air Quality Strategy and hugely undermine all the efforts taken to improve air quality thus far.

Policies to control the use of wood burning stoves/ heating in densely built-up areas are needed to reduce non-vehicular air pollution, which seems to be a growing problem in residential areas in Wiltshire, affecting young people's health and future disease (asthma, lung and heart related) exacerbation in particular.

If Wiltshire Council is serious about addressing air quality, it needs to completely reassess its approach to housing expansion and come up with a Plan that reduces tailpipe emissions (and tyre and brake pad pollution) not increases them. The Council also needs to include a comprehensive strategy for cycling, walking and public transport to mitigate existing air quality issues and mitigate remaining additional air pollution that would result.

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?

An employment led spatial strategy would significantly reduce the amount of commuting and dependency on private cars. Policies that promote ultra-low carbon public transport and active/ battery enhanced active travel will then reduce the need for local car travel/ dependency. This will require policies that create dedicated, fast and safe cycle routes of the type common in

other European counties, and a few parts of the UK. Policies should also promote integrated public transport that improves reliability and increases usage, and further reduces car dependency. Policies also need to promote the installation of on-street EV charging infrastructure to enable those who don't have off-street parking to charge their EVs.

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?

More local renewable energy generation and policies which support this will help overcome this challenge. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively. Distribution Network Operators (currently transitioning to being Distribution System Operators, with wider responsibilities for the distributed grid) are keen to work with Local Authorities in developing their local networks to meet a net zero carbon future. Government money is available for investing in this grid infrastructure and Wiltshire Council needs to work with the DNOs/ DSOs to ensure Wiltshire gets the grid investment needed to achieve net zero for our county. The main focus should be on upgrading grid capacity and infrastructure in the right places to enable renewable energy generation, EV charging and any other investments needed to help deliver net zero via the electricity distribution network.

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?

Much of this has already been covered. Wiltshire Council needs to bite the bullet and:

At a strategic spatial planning level:

- Reduce housing numbers to a sustainable level that will allow net zero emissions to be achieved;
- Develop a genuinely sustainable spatial strategy that does not promote and is not dependent on commuting;
- Reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- Take an employment led approach (not a housing led one that works against achieving net zero targets);

- Measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- Develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- Place proper value on natural capital and account for it in the Plan; and

At a policy development level:

- Develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- Develop and implement supportive renewable energy development policies, including policies that identify and enable renewable energy generation within council farms;
- Develop and implement supportive EV infrastructure policies;
- Work closely with the DNO/ DSO in developing the necessary distributed grid to enable net zero to be reached as quickly as possible;
- Develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies to discourage car use for short journeys.

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

The current proposals work in the opposite direction, particularly in terms the higher-level strategy, which seem to be driven by road building and a focus on commuter housing. With forward thinking policies of the type described above, design will take care of itself (the skills, knowledge and technology are already out there) and viability will quickly catch up. The key message is to be clear about the overarching objectives (net zero) and get the fundamentals right (i.e. do not plan for unnecessary, unsustainable and potentially undeliverable numbers of houses in order to create large commuter extensions that lock in transport emissions, destroy valuable farmland/ wildlife habitats/ carbon sinks, and take a lead from other LPAs on introducing net zero carbon development and effective renewable energy policies). The rest will follow.

Rep ID: Climate157	
Consultee code: Other	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate157
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?	
<p>Wiltshire Council's current Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come. The Local Plan documents point out that "in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030" and that "mitigation is related to dramatically reducing the amount of carbon released in Wiltshire," which is "largely related to emissions from cars and the energy used to heat and power homes and businesses." It is also acknowledged that there is a need to "shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel," and "actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure." Yet these proposals fail to consider climate change and biodiversity in relation housing numbers and locations and fail to propose a strategy and policies that would deliver what is acknowledged is needed. Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield</p>	

sites and those close to existing infrastructure, closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of “dramatically reducing the amount of carbon released in Wiltshire.”

After reducing the housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to “shape places to help secure radical cuts in greenhouse gas emissions” should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy efficiency standards, with on-building/ on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning). Adopted plans such as the London Plan already have such policies in place and many local planning authorities (LPAs) are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council’s ambitions to achieve net zero development are concerned. The excuse that viability wouldn’t allow this carries little weight, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage. Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is “How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?” (i.e., at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Finally, the approach to biodiversity is based on a fundamental misunderstanding that natural habitat destruction can be compensated by marginal improvements to nature elsewhere. The question misses the point completely in that successfully enhancing natural capital requires it isn’t destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state. In describing biodiversity offsetting and net gain as “licence to trash nature,” environmental charity Friends of the Earth point out that nature is declining in the UK, natural ecosystems are under stress and many parts of the UK are becoming biodiversity deserts. Their view is that biodiversity net gain should be a last resort, used only when every avenue to avoid environmental harm has been exhausted.

In terms of habitat destruction and biodiversity loss, no material consideration seems to have been given to the natural capital/ biodiversity impacts of developing Chippenham's sites 1 and 2, and there is only one question that refers to this in the Climate Change and Biodiversity Net Gain section. Questions asked of Wiltshire Council officers in the consultation webinars and at the Chippenham Area Board indicate that these impacts have not been considered in any depth and that this would be done at a later stage (by which time it will be harder to take account of what's discovered, properly consider alternatives and progress the kind of radically different Plan that is needed). Given the unique nature of the Avon and Maren valley and the loss of valuable habitats and biodiversity that would occur if these proposals were to go ahead, we have added our comments on habitat destruction and biodiversity loss under question B2.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF (Section 15 Paras 170, 171 and 175). The Local Plan should also seek to maximise the value of existing farmland in terms of carbon capture, particularly its own farms where it has direct influence over the land and the way in which it is managed. It should plan for a future which encourages progressive agroecological and regenerative methods that promote carbon sequestration and storage

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage scheme (SUDS) solutions to mitigate flood risk that is avoidable in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

Wiltshire Council therefore needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- take an employment (rather than a housing led) approach;
- measure the carbon emissions associated with its spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;

- place proper value on natural capital and account for it in the Plan;
 - develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
 - develop and implement supportive renewable energy development policies;
 - develop and implement supportive EV infrastructure policies;
 - develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies.
- The proposals as they stand would destroy nearly 1,500 acres of farmland and valuable wildlife habitat. The carbon footprint of destroying prime countryside to create this massive development that would then generate even more transport emissions has not even been calculated but there is no doubt that it will take Wiltshire Council's carbon reduction target in completely the opposite direction. Does Wiltshire Council really want to be responsible for such a legacy?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

With regards achieving net zero carbon new development; by undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price in any additional costs into their land deals. Once a clear net zero development policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible and a net zero development planning policy needs to be put in place as soon as possible, given that Core Policy 41 is defunct and the badly insulated houses being given permission at present will all need to be retrofitted in future.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate158

Consultee code: Other Advisory Bodies

Consultee Organisation (if applicable): Cotswold Conservation Board

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate158

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?

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

A3: How should these actions be delivered and measured?

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

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management
The Board supports the measures proposed to address this issue.

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?

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity
In principle, the Board supports the measures proposed to address this issue.
However, we do not consider that the proposed measures (or the document as a whole) goes far enough to address the ongoing, massive declines in biodiversity at a global, national and local level. Addressing biodiversity loss requires a comprehensive set of measures, of which delivering biodiversity net-gain is just one component.
One of the most important measures is for existing wildlife sites to be protected, in line with national policy and guidance, and for these sites to be brought into good condition through effective and appropriate management. In principle, development should not impact on international, national and, ideally, local nature conservation designations. The biodiversity net-gain mechanism should not be used in a way that allows for development to harm these designations.
A key omission from the consultation document is any reference to Local Nature Recovery Strategies (LNRS). LNRS will soon be one of the key mechanisms for helping to halt and reverse declines in biodiversity at the local level. Development should be required to make a positive contribution to LNRS.

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?

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

The Board supports measures to reduce greenhouse gas emissions from new development (and, retrospectively, from existing development).

The main focus should be on reducing greenhouse gas emissions at source, rather than relying on offset mechanisms such as off-site renewable energy schemes.

Within the AONBs and their settings, such measures should, ideally, be implemented in a way that is compatible with – and positively contributes to – the purpose of AONB designation. For example, such measures should be sensitive to the local distinctiveness of the built environment.

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?

However, as stated above, a net zero carbon development policy is necessary but not sufficient to achieve a carbon neutral or carbon negative Local Plan. Such a Plan also requires that development is only allowed in locations that do not significantly undermine the Government’s (and Wiltshire Council’s) carbon reduction (net zero) targets. Hence, the spatial strategy itself needs to support net carbon neutrality, focused on providing housing where there is employment (i.e. to be ‘employment led’), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging, carbon intensive infrastructure (and locations that require this) and removing rather than increasing dependency on private cars to get around.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Policy Theme 4 – Sustainable Energy Generation and Management

With regards to the Cotswolds National Landscape and its setting, the Board supports the use of small-scale forms of renewable energy that are compatible with the purpose of AONB designation. Further information on this issue is providing in the Board's Renewable Energy Position Statement.

We recommend that the Local Plan should identify 'suitable areas' for renewable and low-carbon energy, particularly wind and solar energy. Ideally, this should be implemented for the whole of the Wiltshire Council area, in order to obtain a strategic-level, spatial understanding of potential opportunities. These suitable areas can then potentially be refined at the Neighbourhood Development Plan stage.

We recommend that the process for identifying suitable areas should include:

- a Landscape and Visual Sensitivity and Capacity Study (LVSCS), which takes account of the high landscape value accorded to the AONB designation – land parcels / sites that are identified as having high or medium-high sensitivity should be ruled out;³⁷
- identifying key constraints and creating a buffer zone around these constraints.³⁸

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

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?

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?

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?

Policy Theme 5 - Sustainable Transport and Air Quality

In principle, the Board supports measures that reduce the need to travel, reduce car use and encourage more sustainable modes of transport.

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?

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?

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?

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

Rep ID: Climate159	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Persimmon Homes
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate159a, Climate159b, Climate159c
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

The Report sets out a number of 'Policy Themes' for addressing various aspects of climate change and associated environmental issues. Policy Theme 1 relates to Flood Risk and Promoting Sustainable Water Management. The theme includes provisions for managing water to achieve a greenfield runoff rate plus 20% 'betterment'. It is unclear from the Plan whether this betterment relates to standard climate change adjustments or whether the 20% is expected over and above the climate change adjustment. Clarity is required. It is also noted the requisite improvements to run off rates can be met through any measures in the drainage hierarchy which may, or may not, include SUDS. There should be no expectation in the plan that SUDS are the only means of addressing surface water.

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?

Biodiversity Net Gain

61. Policy Theme 2 (Enhancing Green/Blue Infrastructure and biodiversity) sets out a number of measures to enhance and create new Green/Blue Infrastructure. The Policy Theme also sets out a requirement for all new development to provide a minimum of 10% biodiversity net gain (BNG), which should be protected and positively managed post development for a minimum period of 30 years.

62. With regard to the BNG provisions it would be helpful if the Council adopted a specific method for the assessing and quantifying BNG increase to allow for consistency of approach between planning applications. Persimmon would welcome the opportunity to input towards this method document in due course.

63. It is noted that BNG is referred to within the National Planning Policy Framework (NPPF, Para 170(d) and Para 175(d)), but the NPPF does not specify a number/percentage for net gain. The forthcoming Environment Bill includes a requirement for all future schemes, including the development of land, to deliver a mandatory 10% BNG to be maintained for a period of at least 30 years.

64. Persimmon welcomes the principle of requiring BNG but, without a policy or legislative basis for the 10% requirement it would be premature for the Council to set this target in the Plan at this stage. It is Persimmon's view that this element of the Policy should be more flexibility worded so that applicants should '...seek to achieve a 10% net gain in biodiversity...' as opposed to this being a mandatory requirement.

65. Another issue with the policy is the potential impact on site viability and local plan viability more generally. From site specific point of view, some sites that are due to be brought forward within new plan period will have been contracted prior to the introduction of BNG. The introduction of BNG may negatively impact on viability of sites due to the impact of BNG on land budgets, which may in turn may create issues with minimum values and minimum area provisions in existing contracts. Related to the above point, given the considerable impact that BNG requirements may have on developable areas and/or development costs, it will be necessary for the Council to account for these costs to development within its Local Plan viability evidence, which is yet to be published. Persimmon welcomes the opportunity to comment on this viability work once it has been made available by the Council. Depending on the site in question, we are aware of instances where BNG requirements can take up around 50% of the overall site area. The Council should also be aware of these possible implications of 'land hungry' BNG on the amount of land that may need to be identified in the Plan.

66. There is also insufficient consideration of impact of this new Policy on sites that may be the subject of live planning applications (or reserved matters applications) where land budgets have been fixed. Assuming this Policy is carried forward in the Plan, it may be challenging for some sites to meet the BNG requirements due to unforeseen viability and land budget issues associated with BNG. As such, the Council should introduce transitional arrangements to guard against these unintended consequences outlined above and/or consider and excluding all 'committed' sites identified in the draft Plan from the 10% BNG requirement.

67. Wiltshire Council has not made it clear whether open space and mitigation land (for example or nutrient off-set land) would contribute towards the percentage requirement for BNG. We are aware that in other areas of the Country, Natural England are taking a view that mitigation and BNG must be provided on separate areas. Persimmon strongly objects to this approach. There is no valid reason why land can't serve multiple purposes. Indeed, the NPPF requires that the planning system uses land effectively and efficiently.

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?

Policy Theme 3 sets out the Council's approach to sustainable design and construction (net zero carbon and Electric Vehicle (EV) charging infrastructure). Policy Theme 4 relates to sustainable energy generation and management (on site renewables and storage capacity, decentralised energy systems and adaptation of existing buildings). Finally, Policy Theme 5 relates to Sustainable Transport and Air Quality, including air quality issues and modal shift). With regards to all policy requirements sets out in these Policy Themes, the increased sustainably and efficiently standards will inevitably increase development cost. Persimmon support the inclusion of these policies where they are underpinned by evidence, particularly in relation viability. Until the viability work has been published, many of the elements set out in the Policy Themes cannot be supported. Persimmon welcomed the opportunity to comment on the local plan viability report in due course.

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?

The current proposals would unnecessarily destroy natural capital/ carbon sinks and increase transport emissions through commuting, whilst bearing no relation to local employment or local housing need, which would be better achieved through urban regeneration/ brownfield sites. The latter would be provide affordable housing (e.g. apartments), reduce the need for cars and help rejuvenate the town centres of principle settlements and large market towns that are in danger of being doughnuttred (i.e. having suburbs supported by in-migration and out-commuting, that are disconnected from town centres, with separate shops and services, leading to further deterioration of town centres, vacant shops, and unused town centre facilities).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

58. The Council has produced a Climate Change and Biodiversity Report that sets out five linked key policy themes that will help support the Plan's objectives in respect of adapting to and mitigating climate change. The Report also sets out the direction of travel with regards to biodiversity net gain (BNG).

Persimmon Homes (South Coast) welcomes the opportunity to comment on the Regulation 18 Wiltshire Local Plan Review Consultation 2021. The South Coast office operates in the Southern part of Wiltshire (roughly the defined Salisbury Housing Market Area (HMA)). Persimmon Homes (Wessex) cover the remaining parts of Wiltshire and Swindon; the Wessex office may provide comments separately on the draft Plan.

Persimmon (South Coast) has a number of sites with the Salisbury Housing Market Area which it is promoting for residential development. The draft Local Plan has identified Downton Road Salisbury (Site 6), which is in Persimmon's Control, for an allocation of 275 dwellings. Persimmon's Fugglestone Red site is identified in the Plan as a committed site. The Company is of the view, however, that the employment element of the site, which does not yet have detailed consent, could be reconsidered for mixed use residential led development. Subject to the detailed comments on the policies elsewhere in these representations, the Company firmly supports the identification of the Persimmon sites in the Plan, and we look forward to positive working with the Council to deliver the sites going forward.

Persimmon also has interests in Salisbury Road, Downton site which has not been selected for allocation in the draft Plan. It is Persimmon view that this site should also be allocated in the emerging Plan. Persimmon Homes has produced Site Deliverability Statements for the Salisbury Road, Downton site (and the Downton Road, Salisbury site), which should be read alongside these representations. The Statements demonstrate that the both sites are sustainable and deliverable development opportunities that can be brought forward in the short term.

Rep ID: Climate160	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Natural England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate160
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?	
<p>The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example urban tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. See appendix A [Climate160] for further detail on how to integrate climate change adaptation into the local plan.</p>	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	

A3: How should these actions be delivered and measured?

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

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management

Natural England strongly recommends that all new development adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres /head/day including external water use) and re-use in line with best practice.

Natural England supports the use of multi-functional retro fitted SuDS. The management of surface water run-off through well designed wetlands can be used as an opportunity to improve the quality of GI and create biodiverse areas. The options that exist include balancing pools, wetlands (often in the form of filtration reedbeds), ditch systems, swales, rain gardens and permeable surfaces. Water input can come from any part of a site, including roofs, and may be of a cleaner quality than in surrounding urban or agricultural settings, allowing the creation of high quality wetland and aquatic habitat. SuDS for new development and retro fitted SuDS to existing urban areas can also play a useful role in reducing nutrient pollution to water courses.

Such habitat can also serve pollinators in a number of ways. The larvae of many pollinators develop in shallow water, wet mud or the vegetation associated with water margins. Water margins can also be very flowery habitats featuring plants such as Angelica, Water Mint, Gypsywort, Yellow Iris, Greater Bird's-foot Trefoil, Marsh Woundwort, Great Willow herb and a variety of willows. As such, they have the potential to act as hotspots of pollinator activity from spring until early autumn. SuDS can also buffer against the effect of prolonged summer droughts, providing damp flowery habitats when that of the surrounding landscape has disappeared. If they are combined with low topography, they can also provide opportunities for ground nesting bees and wasps.

. The requirement to use a SuDS should be built into the specification of a new development scheme from the outset. A good online accounts of how SuDS can be designed for wildlife are available from the RSPB/WWT : https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf

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?

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. The economic value of urban parks is now increasingly understood, for example:

<https://thelandtrust.org.uk/the-land-trust-charitable-aims/thebenefits/>

More recent studies have also been completed for the parks within the Bournemouth conurbation.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where appropriate there should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below).

Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity.

Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF ensuring that the loss of priority habitats is where possible avoided. The policy should also ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with separately from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

We advise the local plan should make provision for development of a specific Supplementary Planning Document on net gain that will outline in detail Council expectations of developers and mechanisms for delivery, as well as ensuring net gain is delivered in a suitably strategic way. Natural England would be happy to engage with the Council on implementing net gain into local policy and to advise further on the development of such a SPD.

Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede Biodiversity Metric 2.0. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be measurable.

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?

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

Natural England asks the council to consider providing a supplementary planning document that details guidance on how the relevant policies in the Wiltshire local plan will be applied to planning applications.

The guide is an important (material) consideration in helping to make decisions about planning applications. The information and guidance will be of particular use to developers, agents and architects looking to promote development sites in Wiltshire. It should provide practical advice to help developers comply with the Wiltshire Plan's sustainable design and construction requirements.

This guide should be read alongside other planning documents, in particular the Wiltshire Core Strategy, the Local Transport Plan and the councils emerging strategy papers for both GBI and Climate.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Policy Theme 4 – Sustainable Energy Generation and Management

Natural England support this policy theme. We support the requirement for new housing and commercial developments to include sustainable energy generation.

Natural England supports favoured policy for sustainable energy generation. This is consistent with the council's announcement of climate emergency. It should be made clear that green energy production although favoured does not override the ecological mitigation hierarchy and developments should not be counter intuitive to the recovery of nature. We recommend that the council identifies sites to put forward for sustainable energy generation and assess them under SA/SEA regulations and Habitats directives.

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

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?

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?

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?

Policy Theme 5 – Sustainable Transport and Air Quality

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic³, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

NPPF 181 states planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

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?

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?

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?

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

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees.

Rep ID: Climate162

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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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?

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

PLEASE note that I have recently re-read the Open University's paper on its experimental housing developments in Milton Keynes in the 1960's and a few (so far) other papers.

I can see no evidence yet that some of the things they learnt, for example of orientation of housing on new developments, have been adopted in current practise.

I would very much like to see more exemplars of good environmental and energy conservation in developments. I note your interest in improving conservation in these developments and would be most interested in contributing and/or following what you do in this respect.

I am well out of the field now, and clearly would not wish to interfere. However, as someone who was involved then in the research work of both the electricity and gas industries I support your wish to improve both new developments, and also the methodologies which we in existing housing might make.

There also seems to be a gap - for those who wish to improve existing homes - between the relatively simple things recommended on government websites, and the execution of an informed, rational and economical decision about the adoption of solar, water based heat store, replacement boilers, heat pumps (whether air source or ground source) and additional insulation eg external cladding etc.

Rep ID: Climate163

Consultee code: General Public

Consultee Organisation (if applicable): Vertigo

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:
N/a

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?

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

A3: How should these actions be delivered and measured?

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

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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?

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?

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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?

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

It is essential that the Local Plan is consistent with achieving a zero carbon Wiltshire as variously set out in the Climate Change Act, the Paris Agreement and Wiltshire Council's own declaration of climate emergency. Likewise the Local Plan must also acknowledge the biodiversity crisis and seek to protect and enhance ecology in all areas. A plan that does not achieve the above will be a plan that fails the residents of Wiltshire and beyond. Any such plan is likely to face challenge from ClientEarth and other organisations.

Rep ID: Climate165

Consultee code: Statutory Body

Consultee Organisation (if applicable): Environment Agency

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate165

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?

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

A3: How should these actions be delivered and measured?

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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?

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

Climate Change

We are pleased to see this issue has been given its own document. This demonstrates a commitment to your Council's declaration of a Climate Emergency and acknowledges it as the all-encompassing issue that it is.

Water Sensitive Urban Design

We would encourage you to familiarise yourself with the concept of Water Sensitive Urban Design (WSUD). This concept should be woven throughout the whole Local Plan and includes elements of each of the below topic headings (although it is not limited to these). The following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning - [wsud_ideas_book.pdf](#) ([susdrain.org](#))

Flood Risk

Strategic Flood Risk Assessment (SFRA)

Whilst we are satisfied that the overall proposals accord with the principles in the NPPF, we would remind you of the need to undertake the Sequential Test for all the proposed site allocations against the flood risk criteria identified in the Wiltshire SFRA Level 1, i.e. all sources of flooding.

We note that many of the sites presented include areas of flood zone 1, 2 and 3, therefore implying that the Sequential Approach will be used is designing site layout. We encourage you to be explicit about this in the policy text to ensure readers understand this.

We would highlight that the SFRA Level 1 has not undertaken further detailed flood modelling to establish the climate change extents over the development's lifetime for these allocations that include flood zones. Therefore, we would recommend that SFRA Level 2 is considered for the large strategic allocations which are in proximity to flood zones 2 and 3. This would offer an increased level of certainty over the developable area and consider all sources of flood risk including climate change.

Given the uncertainties above, and in the absence of SFRA Level 2s, we would advise for those sites where there is a current flood risk shown within the potential development boundary that the housing numbers are stated as 'up to xxxx dwellings'. This then allows for any associated changes in updated flood data that may be produced with in a site specific flood risk assessment (FRA), or through updated river modelling by the Environment Agency. This is especially important as the amount of developable area could significantly reduce if climate change flood maps are produced, and show significantly larger flood outlines to our currently published flood map for planning.

Flood Risk Policy

We would recommend that any final flood risk policy does more than replicate national planning policy. We would recommend that additional elements are included in any local flood risk policy. These approaches have been undertaken elsewhere in Wessex. Below are examples of some policy elements that should be included.

- The Council will support the relocation of existing highly vulnerable development (such as park homes) and essential infrastructure on land at risk from flooding provided:
 - the existing development is lawful;
 - the site for relocation is at a lower flood risk ;
 - the size of any replacement buildings or the application site are not materially larger than the existing buildings or site;
 - the type, scale and location of the replacement development is consistent with relevant planning policies; and
 - the applicant provides for the suitable restoration of the existing site.
- Unless agreed with the Environment Agency, development will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river.

- The council will support planning applications for new flood defence and flood management schemes providing they accord with the relevant planning policies.

Infrastructure

Where the proposed development relies on the existing community facilities and infrastructure that is at risk of flooding, developers should be required to contribute (via Infrastructure DPD/CIL) towards securing these facilities over the lifetime of the development. This partnership funding approach is likely to be essential in development and growth being considered sustainable, and securing the benefits of the wider community.

We would suggest that infrastructure in the river corridor is identified when it is in proximity to new growth. This can then be integrated into the master planning of these strategic allocations to deliver the flood risk and environmental benefits required.

Blue/Green Infrastructure

We are pleased to see the climate emergency being linked to blue/green infrastructure. We look forward to reviewing and engaging in the emerging Blue/Green Infrastructure policy document when this is available, as this will provide a critical element of the Local Plan.

It is important that blue green infrastructure is considered as a connected network across the county, and beyond, to allow a significant and meaningful impact from this work. This will allow floodplains to be better connected and increase green spaces for people and wildlife.

Within those proposed development sites that have floodplain as part of their development boundary there is an opportunity to link up the proposed areas of country park to have a more significant environmental feature that deliver extensive environmental, wellbeing and economic benefits to the region.

Therefore, we would recommend that the main rivers in the county should be considered as part of linear country park / open space. This would provide the opportunity to join the growth in towns to other areas along river corridors. We acknowledge that it would need to be carefully designed and interests managed, but could offer significant alignment of environmental benefits (including flood risk). An example of this is on the lower reaches of the River Stour, which forms part of the BCP and Dorset Council areas, which is looking to establish a 20km linear area for multiple uses around the river corridor and floodplain.

Carbon Net Zero

The Blue/Green Infrastructure has a real opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development. Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included in this section. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this, including within any new country park areas, such as in Chippenham.

Other sources of flood risk

We would also highlight that the Lead Local Flood Authority should provide the relevant advice in regards to surface water and groundwater, as well as local knowledge on ordinary watercourse flood risk. In Core policy 67: flood risk of the adopted Wiltshire Core Strategy (Section 6.181) reference is made to a document called Sustainable Drainage Systems: an introduction, published by the Environment Agency. This document is now 18 years old. It would be better to refer to a more up-to-date document and also link it back to Water Sensitive Urban Design as this concept (document linked above) is more holistic and will achieve many more cross-cutting sustainable outcomes than SuDS alone.

Canals

If your local plan policy wishes to support the new canal connection, and use of the River Avon, in Melksham for this proposal you should consider the need to undertake a SFRA Level 2 for this infrastructure project. This scheme has potential for impacting

on the community and therefore a SFRA Level 2 could assist in the integration of the navigational requirements and flood risk in the town.

Both Melksham and Royal Wootton Bassett have the historic lines of the Wiltshire and Berkshire canal running through some sites, we would advise that the River and Canal trust would need to comment on these sites as the flood risk associated with the old canal route will vary even within sites and may affect the potential location of housing and other development.

Natural Flood Management

We support the reference to natural flood management in the last bullet point of policy theme 1. However, we would prefer the removal of the words 'where necessary' as we would argue that natural flood management is always necessary, as it is a holistic concept and is most effective when not limited to individual development sites. It links closely to Water Sensitive Urban Design as mentioned above, and to the preservation and building of soils (above).

Groundwater Protection

Source Protection Zones (SPZs)

When allocating new development sites we advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution. Where this is not possible only the least polluting activities should be allowed, for example public green spaces could be orientated in these locations. Policy 68 of the adopted Wiltshire Core Strategy (section 6.185) includes reference to protecting SPZs. We would encourage you to be more specific in any updated policy wording, steering built development outside SPZ1. Reference to a document called 'Groundwater Protection: Policy and Practice' should be updated to refer to 'The Environment Agency's approach to groundwater protection', February 2018 Version 1.2 - The Environment Agency's approach to groundwater protection (publishing.service.gov.uk)

Where mains surface water drainage is not possible, high quality SuDS systems will ensure developments within SPZ2 and 3 do not contribute to the pollution of controlled waters, including groundwater. These should be designed to be passive in order to prevent potential degradation in the event that maintenance is not carried out.

Groundwater Quantity & Water Resources

Specific Water Resource pressures are known to exist across much of the Wiltshire Area, including but not limited to Hampshire Avon, Bristol Avon, including Malmesbury Avon area, Bradford on Avon etc. Development in these areas should be conditioned to use the most water efficient technologies to reduce the water supply demands. Policy theme 1 refers to this idea directly - All new development should be designed in a manner that limits the daily consumption and disposal of water – whilst Policy theme 3 refers to sustainable design & construction, of which water efficiency could fit within. Wherever you wish to position water efficiency within your policy we would strongly encourage you to be specific about water use standards in new development.

Currently this is enforced by Building Regulations part G, and limits water use to 125 litres per person per day. This has not kept pace with our need to address climate change, therefore the revised Local Plan should aim to better these regulations. (We are

aware that Wiltshire Council specify 110 litres per person per day, but this is inconsistent across the Council area, and no longer low enough). We would argue that specifying a water use limit of 95 litres per person per day in new residential development would be entirely appropriate, for many reasons. It would contribute significantly to meeting objectives relating to carbon net zero, biodiversity protection, Hampshire Avon SAC protection, groundwater protection and more. As part of Policy theme 3 – sustainable design – it states “Such standards would need to be clear, easily implemented and not put at risk the viability of development”. Specifying 95 litres per person per day (as submitted in a water use calculator as part of planning applications) would be clear, easily implemented (using modern fittings/appliance technology) and would not risk the viability of development. Notwithstanding the above, Wiltshire Council should ensure sufficient water resource supply headroom exists for development to take place, without having an adverse impact on the water environment and Hampshire Avon SAC.

As part of Policy theme 3 it is stated “All new development should support the collection and re-use of rainwater and grey water”. We are unsure what this would really mean for a development. How does a development support rainwater collection if it is not required to include it? We would advise the use of the word ‘include’ instead of ‘support’, and the policy should include how this could be achieved.

Biodiversity

In the document called ‘Addressing climate change and biodiversity net gain through the Local Plan’ it is stated under Policy theme 1 that “...new built development should be in Flood Zone 1”. However, many sites contain areas within Flood zones 2 & 3. Whilst there may not be an intention for 'built' development in these areas, any alterations within floodplains (landscaping/gardens, formal parks etc.) may give rise to unwanted impacts and lead to the disconnection of wildlife corridors. Areas within zones 2 & 3 should not be included within the area for built development to ensure that they continue to function as natural river floodplains without modifications. Also see section on blue/green infrastructure above. Dedicating these areas to blue/green infrastructure, such as linear country parks, can complement new developments whilst safeguarding the use of that land for flood management, biodiversity net gain, recreation, wellbeing etc.

Where there is described as 'a medium risk of flooding', and 'management measures are achievable', it is not clear what's meant by 'management measures' and how these are demonstrated to be achievable. We suggest this is expanded upon.

We would encourage you to require the biodiversity net gain element in new developments to be more ambitious than 10%. Following the climate and ecological emergency your Council has declared you could require a minimum of 20%. This would align with the Environment Agency's principle that our future flood risk management schemes will need to achieve a 20% biodiversity net gain.

A connected network for wildlife needs to be created across Wiltshire (and into surrounding areas) to prevent pockets of isolated biodiversity improvement. The creation of this network can be integrated with recreation, non-motorised transport, wellbeing, flood risk management and Water Sensitive Urban Design so that the network has multiple functions and benefits.

The document does not include any reference to Nature Recovery Network (NRN). The NRN is a major commitment in the government's 25 Year Environment Plan and part of the forthcoming Nature Strategy. Local policy should link to this commitment as it is expected that it will be delivered at district level - Nature Recovery Network - GOV.UK

Pollution Prevention

Adopted Core Policy 69 details measures required to protect the Hampshire Avon SAC from nutrient pollution. It will be necessary to update this policy to reflect the most recent agreement made between Wiltshire Council, the Environment Agency and Natural England.

Rep ID: Climate166

Consultee code: Other Advisory Bodies

Consultee Organisation (if applicable): Cranborne Chase AONB

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate166

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Addressing Climate Change and Biodiversity Net Gain

23. The section on addressing climate change and biodiversity seems to be largely discussion rather than promoting policies for the next 15 years. You may be aware that there is considerable encouragement from Defra for the AONBs and National Parks to play a major role in nature recovery, and that such topics as biodiversity net gain and environmental net gain are seen as mechanisms to help towards that broader objective.

24. In planning terms, biodiversity net gain should supplement the strategies of 'avoid' and 'mitigate' impacts on natural capital and environmental assets rather being a substitute or alternative. The strategic focus should be on nature recovery, identified in government's 25-year Environment Plan.

25. The requirement for local planning authorities to map and consider ecological networks within their plans, policies and decisions is referenced in several places in the National Planning Policy Framework (updated 2019): Para 170 states that "Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures." That indicates a clearer focus is needed on improving resilience to climate changes, and doing things in bigger, better, and more joined up ways. Biodiversity net gain is but one tool available.

26. In addition to a climate emergency there is an ecological emergency. Wiltshire should be putting the ecological emergency as a priority alongside the climate emergency in all plans and policies. NPPF Para 174 indicates that "plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

27. That provides a basis for a strategy where all development must ensure that the importance of habitats and designated sites are taken into account, and opportunities for the creation of local and county-wide environmental networks, wildlife corridors, and conservation compensation areas are linked together.

28. Effectively that means development should, as a first principle, avoid adverse impact on existing environmental features. It should also enable net gains by designing in landscape and environmental features and enhancements; that can include opportunities for biodiversity conservation alongside new development. Where adverse impacts are unavoidable, they must be adequately and proportionately mitigated. When full mitigation cannot be provided, compensation through environmental net gain and conservation

compensation areas should be directed to assist with coherent nature recovery networks that are bigger, better, and more joined up. Examples of other recent local plan policies are attached in Annex D.

29. Associated with these matters are the 'tests and trials' being supported by Defra for environmental enhancements on agricultural land as the system of funding changes towards 'public money for public goods', as set out in Government's 25-year Environment Plan. The AONB would, therefore, wish to see more explicit support for nature recovery flowing from each and every planning permission, with special attention on what is achievable in rural areas. This AONB Partnership advises that could be just in relation to developments within

the AONB or by the AONB also being the 'home' for nature recovery actions supported by payments from developments within, say, 10 kilometres of the AONB. This AONB's engagement with Defra's tests and trials indicates the latter might be the preferred, and more practical, arrangement.

30. Policy theme 4, Sustainable Energy Generation and Management, is noted and doubtless you will be aware that wind turbines and field scale photovoltaic panels have substantial and significant adverse landscape impacts. These large-scale energy generators should, therefore, be located outside of the sensitive landscapes of the AONBs and the settings. The government's continued support for large scale off-shore wind farms indicates that only domestic scale wind turbines are likely to have a land based future.

31. Notwithstanding this AONB Partnership's concerns about field scale solar panels, where there are not Listed Building, or Conservation Area issues, the AONB has encouraged the provision of solar panels on all new build and extension projects, both domestic and commercial. This AONB does, therefore, strongly advise that there should be more explicit support for this approach in the reviewed Wiltshire Local Plan.

32. The physical characteristics of this Area of Outstanding Natural Beauty mean that with a small and widely spread population sustainable transport over an extended area is unlikely to be achieved to any great extent. It is highly likely that there will continue to be a significant reliance on personal transport within and around this AONB even though the fuel systems may evolve over the coming 15 years.

33. The AONB Partnership has been acutely aware for many years that although there are two railways traversing this AONB there is little benefit to the AONB, other than the station at Tisbury. That does provide opportunities to commute to Salisbury, Yeovil, and stations further afield, as well as providing a form of sustainable transport to bring in visitors. Nevertheless, further stations or halts could facilitate employment activities and an expansion of sustainable tourism. The AONB would, therefore, wish to see a commitment in the reviewed Wiltshire Local Plan to promote further stopping places within the AONB and the encouragement of a shuttle service on both lines from Salisbury westward and north westward. This AONB does, therefore, support the proposal to restore a railway station facility at Wilton at a point where the facility can serve both lines.

34. Since the adoption of the Wiltshire Core Strategy the Cranborne Chase Area of Outstanding Natural Beauty has achieved international designation as the world's 14th International Dark Sky Reserve. It also happens to be the first Area of Outstanding Natural Beauty to achieve Reserve status. It would, therefore, be appropriate for the reviewed Local Plan to include policies to protect the IDSR (and the other dark skies of Wiltshire) from light pollution and to promote good, dark sky compliant, lighting; see Annex C. The recently revised Wiltshire Highway Lighting Strategy has taken on board many of the criteria and the enhancements to highway lighting in Wiltshire were recognised in the award of IDSR designation.

Rep ID: Climate167

Consultee code: Other

Consultee Organisation (if applicable): Wiltshire Ramblers

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate167a, Climate167b

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?

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

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

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?

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?

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?

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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?

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

The paragraph in the succinctly named 'Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition' paper in which we would have expected PRowS to be considered is 4.6. In this paragraph five themes are identified for closer investigation and evidence gathering, and theme 5, 'Promoting sustainable transport, active travel and air quality' is the relevant one. This gives rise to 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?'

The Wiltshire Core Strategy (which it appears is to be superseded by the Local Plan) envisaged supporting improvements to the PRow network, but was vague about how this should be done. There has been a great deal of publicity over recent months about encouraging 'Active Travel', that is walking and cycling locally rather than going by car. This is envisaged to lead to substantial reductions in carbon emissions. However this will not be achieved without a significant amount of investment, especially if it is intended to see results by 2030, which is only nine years away. This will need to be done by optimising car free routes between towns and villages, and integrating these with public transport.

Wiltshire's vast network of PRowS – there are nearly 4,000 miles of these – invites many possible choices for Active Travel routes, but there are enormous obstacles to be overcome:

- 1) Wiltshire's PRowS are a legacy of the 1940s and 1950s, so any of them identified as being appropriate for Active Travel routes are likely to need rationalisation and upgrading to make them attractive enough to persuade car drivers that they can be used as an alternative
- 2) The choice of routes to be nominated for Active Travel will entail local research and consultation, through Parish Councils and interest groups
- 3) There will inevitably be objections and legal challenges from local residents and landowners to overcome
- 4) The health and climate emergency gains of Active Travel will require a great deal of ongoing publicity and campaigns to retain support
- 5) Routes should be compatible with local bus services, and their providers' coordinated publicity sought

There are obvious difficulties in implementing this programme, the most pressing of which is that the present Countryside and Rights of Way department has the expertise but is woefully short of staff that could supervise it. The department has suffered from almost continuous cuts to its budget since the austerity programme began in 2010, and appears to be the last in a long line of Council departments when considering its relative importance and need for additional funding. There are at present only 6 Countryside Access Officers to attempt to deal with the very high volume of path problems being reported by the walking public - some 1400 since September last year, we understand, not to mention the number of path problems accumulated up to then. Although it is our experience that the Countryside Access Officers do an outstanding job given the meagre resources at their disposal, this staffing level is clearly hopelessly inadequate. An early reassessment of the department's staff requirements should be made to enable it to support Active Travel in a meaningful way so as to produce tangible results by 2030. If this is done it will

also take the department a long way towards being able to fully address the key issues set out in paragraph 8.2 of the Council's Countryside Access Improvement Plan 2015-2025.

The health benefits of walking are well known and have been proven by many studies; the need for the public to be able to use PRowS safely has been highlighted by the covid-19 pandemic, and yet their continued existence seems to be taken for granted. But unless steps are taken to restore the network at least to the condition it was in before the austerity campaign began, many PRowS will deteriorate to the point that they will become unusable, and indeed this has already happened to far too many of them.

The Slow Ways project, which we enthusiastically support, seeks to get the public out walking on the PRowS which connect local communities together. This is just the kind of initiative which should greatly reduce the number of car journeys taken, and thus contribute significantly to achieving the objectives of the Council's Climate Change plan, but it will also put vastly increased pressure on our PRowS, and may even lead to accidents unless something is done urgently to address the lamentable deficiencies in or network of PRowS.

We note that there is no mention of PRowS in CP (Council Policy, presumably?) 52 in Appendix 1. This "seeks to maximise the retention and enhancement of Wiltshire's green infrastructure"; what could be greener than its extensive network of PRowS? CP 53 "seeks to safeguard the historic routes of Wiltshire's canal network with a view to its long-term re-establishment as navigable routes". Whilst this is indeed a laudable objective, this network is a microcosm of the RoW one, which seems to have somehow avoided any mention in the Plan. CP63 is that "Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury", with the first of these to "consider the implementation of....new and improved networks of routes for pedestrians and cyclists". This is all well and good, but how about considering the thousands of miles of such networks outside these towns?

Rep ID: Climate168	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Calne Without Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate168a and Climate168b
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?	
<p>Not based on the scale and scope of development plans proposed. It is a sound assumption and reasonable to expect carbon reduction outcomes that are deliverable, given sustainable growth in the right locations. In fact, it is a requirement of planning legislation and the National Planning Policy Framework (NPPF) that local plans are aligned with the Climate Change Act and the Government's net zero carbon by 2050, and 68% reduction (on a 1990 emissions baseline) by 2030, national target. This is a clear legal duty under Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to, climate change. In other words, Wiltshire's Local Plan not only has to 'deliver outcomes that significantly reverse existing carbon emission trends before 2030' but needs to, as a minimum), align and demonstrate this alignment with these national targets.</p>	

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

The plan should be employment led to radically reduce the need for additional commuting. This would mean abandoning the policy of unsustainable growth that simply attracts relocation from along the M3, M4 and A350 corridors, with its associated dependency on commuting. It would mean housing numbers that genuinely meet local need and are linked to local employment opportunities, so that more people can live near their place of employment without the necessity to commute long distances. A plan with lower, sustainable housing numbers would not require the kind of extensive road infrastructure being proposed for example, in Chippenham with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a huge associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future. Nor would the Plan thereby embed vast quantities of emissions for years to come as a result of the commuting that will inevitably result, as has happened with previous urban expansion, causing the current level of congestion and tailpipe emissions.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, will have the effect of reducing commuting and private car dependency

Any new housing and industrial development must be designed and constructed in compliance with the highest sustainable and environmental standards, and these must be enforced to ensure there are no emissions and potentially negative emissions, associated with all spatial development, which will have the added benefit of removing the need for costly retrofit later. This is likely to require the installation of heat exchange pumps, solar power generation capability coupled with efficient insulation. Existing housing stock should be brought to a zero-carbon standard by providing financial incentives to encourage the installation of heat exchange pumps, solar power and insulation.

The reliance on use of carbon fuelled vehicles must be reduced, possibly by use of road pricing at peak times, and using the revenue to invest in low-cost sustainable public transport options with the necessary links and frequency that ensure high volume use. There should be major investment in the infrastructure necessary for charging of electric vehicles, which might attract a road pricing discount.

In short, to deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to carbon fuelled vehicle dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of development and adoption.

Despite the intention outlined in the plan to address climate change and biodiversity, and the Climate Emergency declaration in which the Council commits to seek to decarbonise the county, the Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come (i.e. precisely the opposite of the intention).

A3: How should these actions be delivered and measured?

See A2 – The Local Plan should include an industrial strategy to identify and attract suitable employment to minimise the requirements for commuting.

For any development the plan must provide sufficient incentives and controls to ensure developers deliver any new buildings (domestic and industrial) to the required zero carbon standards. Similarly, there will need to be appropriate incentives to motivate the community to switch to electric powered vehicles, with appropriate infrastructure providing convenient and accessible charging points. It may be necessary to make arrangements for the disposal of petrol/diesel vehicles at no cost to the public. Support and incentives should be provided to help people convert existing buildings to be carbon neutral by installing heat exchange pumps, solar panels, efficient insulation and charging points. A review should be undertaken of current public transport (buses) to ensure rural communities can enjoy regular and reliable electric powered buses.

Carbon emissions should be measured widely by placing monitors in appropriate locations; with the readings regularly published so that the community is able to monitor the impact of the measures being introduced. Similarly, home-owners and tenants should be provided with means of monitoring carbon emissions; possibly using similar technology to that employed by Smart Meters to enable ease of collection and publication.

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

There must be a concern about committing to building in Flood Zone 1, even with flood resilient design methods. Is it practical to expect people to commit to purchase properties where a flood risk exists, or will the council be providing insurance to cover this risk that may not be available commercially at reasonable prices?

Flood risk will be exacerbated by projected climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. Site 1 to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).
All new development must incorporate Sustainable Drainage Systems – where this is not technically feasible it should not be allowed to proceed, thus ensuring water run-off is fully managed. Providing a loophole for developers to claim a solution is not technically feasible is a licence for avoidance.

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?

This is a reasonable statement of ambition, but the question appears to be based on a false premise since natural capital would generally not be enhanced by any proposed development, and would be spectacularly damaged by siting development, for example to the East of Chippenham in the Avon and Marden valley.
Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the loss of natural capital caused. It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed development would destroy.
Final judgment should be reserved until the Green Blue Infrastructure (GBI) strategy is published.

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?

The measures are a reasonable baseline. However, there must be concern about the statement that '...standards would need to be clear, easily implemented and not put at risk the viability of the development'. This appears to be a charter for avoidance and

an obvious loophole for developers to exploit. If it is not viable to build sustainable homes that have zero impact, planning should not be approved.

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Furthermore, successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

An estimate of the carbon emissions and the natural capital loss associated with the proposed sites would be a good starting point in being transparent about the damage to the climate and environment that would result.

A key omission is any clarity on how support might be afforded to low-income households who are unable to convert existing dwellings to achieve a zero-carbon rating. This issue is likely to be accentuated as a result of the current pandemic and the consequences for many low-income households.

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?

Yes. By undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs associated with compliance with zero carbon standards into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible, and a net zero carbon policy needs to be adopted as soon as possible (i.e. from 2023 at the latest and preferably sooner).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

It should not, the commitment to a carbon neutral environment requires it to be viable, otherwise why make the commitment. Commercial viability, as opposed to social viability, will be dependent on the developers and their appetite for risk and innovation. Potentially, a developer who can deliver to the necessary high standards to achieve a measurable zero-carbon result will be very well placed to secure further work in many locations. It would seem an ideal challenge and business opportunity.

There needs to be a balance between viability and acceptance of the need to change so the focus should be on:

- developing a carbon neutral spatial strategy;
- putting net zero carbon development policy in place;
- actively promoting renewable energy development;
- supporting the transition to ultra low emission vehicles (principally Electric Vehicles).

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The performance standards should be of the highest order with no compromises. Wiltshire might set itself a stretch target of delivering to standards higher than that dictated by central Government.

Targets might include, retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

By the introduction and use of incentivised schemes (cost and risk share). Provision will need to be made to support low-income households to meet the necessary standards.

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?

This appears to be a relatively challenging list of goals. Wiltshire is a county that could benefit from energy produced by wind generators. This should be considered and researched as a viable alternative energy source. Where new buildings are being planned, they should be incorporating solar tiles in the design stage.

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

The key must be to encourage and support all technologies that reduce emissions and provide sustainable energy at a reasonable cost i.e. no greater than existing sources.

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?

Yes, and these should be consistent with those suggested by the Committee on Climate Change i.e. between 30% and 45% by 2030.

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?

There should be support (financial, technical and practical) to retrofit and adapt existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production and use. In conservation areas it may be sensible to look at providing incentives to incorporate such technologies in a sympathetic manner.

In listed buildings considerable care will be needed to ensure the character of the buildings is not changed. In some situations, in Wiltshire listed buildings will be thatched and solar panels will not be an option; so remote and discrete ground siting may be an option or by the use Air and Ground source pumps for heating. In all cases consultation must take place with the owners of older buildings to ensure a sensible and sensitive solution is achieved. Given the unique nature of some small villages in Wiltshire the local community will need to be consulted to ensure they are supportive of changes that could result in a significant change to the character of their community.

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?

The paper states that “the Council considers that increasing the level of self-containment within Wiltshire’s settlements offers the best solution for tackling unsustainable, carbon-based travel patterns.” It further states that “to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles.”

Despite this, the spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution for many years to come. The spatial strategy also promotes additional air pollution in Chippenham and neighbouring Calne by them becoming dormitory communities for people working in the M4 corridor. A licence to travel and pollute.

A more organic and local employment-led development approach, with supporting policies, would prevent large scale commuting and associated emissions/ air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work.

Policies and incentives to reduce travel e.g. road or congestion charging, and the use of private carbon fuelled travel patterns may help achieve the goal. This should be allied with to a fundamental review of public provision. For many rural communities the bus service has been reduced to an absolute minimum. To support delivery of improved air quality and reliance on individual vehicles this will need to change, with more buses, extra bus routes serviced by a reliable and comfortable zero carbon service at competitive prices. Similarly, careful attention must be given to relieve certain areas of traffic congestion if we are to have any chance of reducing air pollution.

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?

See B12. The provision of an appropriate accessible infrastructure (publicly and within homes) for greener fuelled vehicles coupled with disincentives – road charging for carbon fuelled vehicles.

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?

All new developments should come with a levy on the developer to provide adequate access to the charging infrastructure necessary to support green vehicles. It should be a condition that no new site can be occupied until the developer has secured sustainable energy supplies to ensure that electric vehicles can be used and charged at that development. This should incentivise the developers to work with the Distribution Network Operators and Distribution Service Operators to provide the necessary supply. The responsibility should not necessarily fall to the council.

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?

There needs to be a fundamental re-think. Wiltshire Council needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;
- take an employment led approach
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- place proper value on natural capital and account for it in the Plan;
- develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- develop and implement supportive renewable energy development policies;
- develop and implement supportive Electric Vehicle infrastructure policies;

- develop and implement supportive integrated public transport and active/
- battery assisted travel infrastructure development policies.

In the end the viability of any scheme is a judgment to be made by the developer. The challenge is to ensure that there are sufficient incentives for the developer to meet the zero carbon requirements set by the council that provide a reasonable return for the investment made. It is likely that high environmental and sustainability standards, at least initially, will be more expensive. However, the broader adoption of such standards and new ways of working is likely to drive down costs in the long term. Therefore, the pursuit of the high standards necessary to achieve the Council's environmental and climate change goals should not be compromised in favour immediate results and profit.

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

Calne Without Parish Council acknowledges the challenges arising from climate change and is supportive of the Wiltshire Council initiative to make the county of Wiltshire carbon neutral by 2030. But this support assumes this must be delivered through sustainable development designed to tackle and adapt to and mitigate the effects of our changing climate, whilst ensuring our communities are desirable and safe places to live and work.

Rep ID: Climate169

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Royal Wootton Bassett
Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate169

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

4.0 ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

4.1 The Town Council supports the Council's ambitions to make Wiltshire carbon neutral by 2030 and to take steps to tackle climate change through the Local Plan. Sites which are allocated for development should be sustainably located, have access to services, amenities and public transport, and encourage the use of active travel modes.

4.2 In Royal Wootton Bassett, a bypass to the south of the town would help to reduce congestion and air pollution in the town centre caused by the build-up of stationary traffic. The Local Plan should also provide support for a restored canal link / cycle route between Royal Wootton Bassett and Swindon as a sustainable transport connection between the two settlements.

Rep ID: Climate170	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Turley
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Bloor Homes South West	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate170
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

We generally support the objectives set out in relation to Carbon Neutrality by 2030 and recognise the potential role that the Bloor Homes site could play in delivering these outcomes. However when these objectives are carried through into LPR Policy, caution must be exercised on retaining deliverability and viability of the LPR allocations (and the plan as a whole), and ambitious local policy should not be significantly out of step with the climate and carbon requirements being set by national policy.

Rep ID: Climate 171

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Chapman Lily Planning Ltd

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate 171

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?

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

A3: How should these actions be delivered and measured?

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

Primetower Properties are supportive of the aims of 'Policy Theme 1' which relates to tackling flood risk and promoting sustainable water management. The site at Winterslow is within Flood Zone 1 and the layout accommodates a Sustainable Drainage Systems (SUDS), the design of the drainage system will ensure that flood risk is not increased or exacerbated elsewhere. The SUDS features within the proposed layout have been designed as multi-functional areas, sitting within and forming a landscape setting being an integral part of the site's green and blue infrastructure. At the detailed design stage it will be possible to maximise permeable hard surfacing and to include, where appropriate, grey water recycling.

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?

Primetower Properties have been particularly mindful of the opportunities to enhance Green and Blue Infrastructure and Biodiversity as part of the proposed layout – this mirrors the aims of 'Policy Theme 2'. This consultation response is accompanied by a detailed Woodland Management Plan for Brown's Copse which details the unique opportunity, which can only arise from this development at this scale, to provide a Vision and Objectives for Brown's Copse for the next 10 years and the strategy/actions to deliver these. The environmental enhancements resulting from the management plan include;

- Enhancing the habitat and ecological value of the mature broad-leaved woodland through the management of veteran trees and deadwood habitat, re-establishing a pattern of rotational coppice and through selective/regeneration thinning and felling of standards, to diversify the age classes and variety of tree species.
- Enhancement of ground flora and opportunities for native tree regeneration through careful management of light-levels to avoid the creation of bramble thickets and species-poor bracken.
- Expansion & protection of the woodland edge habitat and good management of the surrounding habitat buffers and maintaining ecological connectivity with surrounding woodland & hedgerow habitats
- Generating a sustainable supply of woodfuel and coppice products to deliver environmental/habitat benefits
- To protect any known archaeological features.

- To manage deer grazing pressure by the use of protective measures but at the same time balancing the cultural and amenity value of these large herbivores with the need to regenerate woodlands and enhance biodiversity.
- Provide and implement a management strategy with regard to Ash dieback

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?

Primetower Properties are supportive of the aims of 'Policy Theme 3' but would advocate a proportionate approach to such proposed requirements as new developments 'should achieve net carbon zero standards'. The implications of such aspirations with regard to development viability will need to be considered, it is contended, on a site by site basis

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Rep ID: Climate172	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Future Chippenham Wiltshire Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below:
<p>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?</p>	
<p>The Emerging Spatial Strategy recognises that new development for housing and employment in Wiltshire needs to be delivered whilst tackling climate change as the top priority.</p> <p>Future Chippenham supports the climate change outcomes relating to carbon emissions set out in the Local Plan but considers these may need to go further if the Council is to achieve its target of carbon neutrality by 2030. The approach to achieving carbon neutrality and targets should be set within the Local Plan, with careful consideration given to measuring and minimising embodied and operational carbon to reduce energy demand from any new development. We also suggest that the Local Plan should develop evidence-based, detailed policy that phases in and enables carbon neutral new development within Wiltshire over time. Guidance for new development within the Local Plan and supporting documents should allow for an increase in local energy production and storage and meeting energy demands from zero/very low carbon sources, including large scale increase in electric vehicle use and their charging facilities. A key focus on increasing the use of zero emission public and private transport and active travel modes will support a reduction in carbon emissions from transport. Achieving carbon neutrality will mean, once</p>	

all measures to reduce carbon have been explored, offsetting or sequestration (by vegetation) of residual carbon within new developments or off-site. Offsetting and sequestration will need to be considered as part of an overall carbon neutrality strategy. Showing clear alignment with the target of carbon neutrality by 2030, a key objective of the Future Chippenham Draft Concept Framework (Appendix A) is that Future Chippenham will be a Net Zero Carbon development that is energy and resource efficient, minimises carbon emissions and offsets or sequesters carbon to achieve net zero and reduces car-based and other sources of air pollution, in order to help the environment now and in the future. Carbon reduction initiatives will be at the forefront of design considerations.

Future Chippenham support this approach, but recommends that reference is made to the need to adapt to climate change alongside the need to reduce carbon emissions, as any new development will need to tackle these two interconnected challenges, if it is to address climate change in a successful way.

A changing climate is now a reality and unavoidable, so resilience needs to be designed into any new development. Like everywhere else in the UK, the risk of extreme flooding, extreme heating and extreme cold need to be considered and suitably addressed via policy implementation and broader lifestyle changes, given that adaptation measures by themselves, such as cooling, have the potential to generate carbon emissions.

Directly addressing the issue of a changing climate, another objective of the Future Chippenham Draft Concept Framework (Appendix A) is that Future Chippenham will be climate resilient and adaptable to climate change, with buildings which are designed to be flexible in their use over time, rather than being replaced. Surface runoff and fluvial flooding will be mitigated by water features that address flooding issues in a blue network of recreational routes and waterbodies which, in turn, will enhance the green infrastructure network.

The importance of dealing with the biodiversity emergency has been recognised elsewhere in the Local Plan consultation documents. This has not yet been clearly established in the Spatial Strategy

We note that the biodiversity emergency is addressed through an objective of the Future Chippenham Draft Concept Framework (Appendix A) to create an environment and biodiversity positive development with measurable improvement resulting in net environmental gain and measurable net gain in biodiversity.

Further details on how carbon emission reductions, adaptation to climate change and biodiversity and environmental net gain may be achieved in Future Chippenham are set out in Appendix A - Future Chippenham Draft Concept Framework and Appendix F – Future Chippenham Sustainability Report.

Further representations that respond to 'Addressing Climate Change and Biodiversity Net Gain' consultation paper are set out in Section 4 below.

The Local Plan can no doubt deliver outcomes that place new development on the pathway to carbon neutrality by 2030 and in the process of doing so it can contribute to new and existing development reducing carbon emissions, particularly in new development allocations.

Future Chippenham is committed to delivering the outcome of a Net Zero carbon development, as set out at the beginning of these representations.

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

The Local Plan could mandate carbon neutral new development with appropriate phasing through the preparation of a properly evidenced Net Zero planning framework allowing for increasingly stringent targets over time and clear identification of the implementation actions.

The council could expand the remit of the Local Plan and develop evidence-based policies to make existing development carbon neutral covering the refurbishment of buildings, the production and storage of renewable energy and the sequestration of carbon at scale.

Future Chippenham is committed to delivering the outcome of a Net Zero carbon development, as set out at the beginning of these representations.

A3: How should these actions be delivered and measured?

The council will need to consider the appropriate action delivery mechanisms working with its partners and with developers. An adequate monitoring framework will need to be in place to ensure effectiveness of policy in the future.

Future Chippenham is committed to working with the council to identify appropriate delivery mechanisms and monitoring frameworks.

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

The measures set out in the document with reference to Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management are comprehensive.

One additional aspect that requires consideration, perhaps through a separate policy theme, is Overheating in Indoor and Outdoor areas as a result of a changing climate.

Minimisation of overheating of outdoor areas can be achieved through a variety of measures including enhancing Green Infrastructure, enhancing air movement and shading, avoiding reflection and heat absorbing surfaces, and reducing combustion engine vehicles.

Overheating of indoor spaces, on the other hand, can be avoided through the incorporation of design measures including green roofs, optimal building orientation controlling solar gain, shading, mixed mode and cross ventilation strategies.

Future Chippenham highlights that such measures are considered in the Future Chippenham Concept Framework Water Infrastructure section: The new development will use natural flood management and sustainable drainage (SuDS) techniques to mimic nature and manage surface water drainage close to where rainfall falls. The constructed wetland features will also provide new riparian habitat and an attractive setting for homes and employment. Water neutrality is the long-term aim. This would be achieved by limiting new demand for potable water and using alternative sources of water including: onsite rainwater, recycled grey water and possibly recycled blackwater to replace mains potable water. In addition, the Sustainable Buildings section sets that that All buildings will be highly energy and water efficient, seeking to meet energy needs from renewable energy. As far as possible they will adopt passive cooling measures and external shading to avoid overheating.

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?

Yes, they are a good set of measures. Future Chippenham will identify specific net gain through consultation with statutory consultees and reflect these within the Concept Masterplan. Future Chippenham is committed to delivering the outcome of biodiversity net gain set out at the beginning of these representations.

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?

Yes, they are a good set of measures. Future Chippenham Draft Concept Framework proposals are in full alignment with these as set out in the Sustainable Buildings section - All buildings will be highly energy and water efficient, seeking to meet energy

needs from renewable energy. As far as possible they will adopt passive cooling measures and external shading to avoid overheating. Preference will be given to low carbon materials, such as wood, being used for construction. In addition, employment buildings and schools should be net producers of renewable energy as far as feasible and practical. All buildings will be healthier and more affordable to run.

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?

Moving to a position where all new development is rated as zero carbon achievable will imply tightening standards over time between 2023 and 2030 so that development constructed after 2030 will be net zero carbon but any development built before that date will increasingly have net zero characteristics and can be retrofitted at a later stage for the characteristics that are not net zero. One aspect to note here is the requirement for new development not be dependent on gas for heating from the outset, instead heat to be provided through renewable sources such as heat pumps.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

An abrupt move to deliver zero carbon new development is likely to affect scheme viability so it is important that a transition period is provided for the development industry and local housing market to adapt.

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

Current Part L Building Regulations do not deliver the type of buildings required to achieve net zero; nor do the Part L 2019 proposed changes nor rating standards such as BREEAM and the Home Quality Mark. They only address 'regulated' CO2 emissions associated with heating, cooling, ventilation, hot water, and lighting. This leaves unaccounted emissions from appliances (such as fridges, home entertainment systems, etc.). Embodied carbon, charging of electric vehicles and energy flows are also not considered. As more buildings look to be net-zero, balancing the grid energy flows will become more and more

important. Again, the Building Regulations and existing rating systems do not address the idea of multiple buildings forming an energy system.

It is important that the Council gives proper consideration on how the shortfalls above can be addressed so that new development in Wiltshire is placed on a pathway to net zero.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

The Council could lead retrofit led regeneration of whole neighbourhoods, working with local people, ideas and skills, to create healthy sustainable communities. The delivery of high-quality whole home retrofits can be used as the catalyst for wider improvements. This could be linked to new development.

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?

Agree that measures are comprehensive. Future Chippenham notes that section Energy Infrastructure of the Future Chippenham Draft Concept Framework set out the following: The development will be highly energy efficient with renewable energy produced locally. A gas network will not be provided as it is a fossil fuel. The new electricity network will be delivered in a manner that allows investment in smart grids and energy storage. Smart grids involve a variety of operation and energy measures including; smart meters, smart appliances, renewable energy generation, communication and information technology. The integrated network can embed multiple renewable energy generators in a Virtual Power Plant. Installation of community renewable energy generation scheme (generating more than is needed by the development) and feeding back to the grid will offset carbon emissions and generate revenue for the community. EV charging will be integrated in the Virtual Power Plant to ensure maximum advantage is taken of the potential of the batteries to provide storage. All energy infrastructure will be climate change resilient.

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

The Council should establish which technologies are suitable for its territory through a renewable energy strategy and encourage those through the Local Plan. See representation above for considerations already embedded in the Future Chippenham Draft Concept Framework.

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?

The renewable energy strategy mentioned above should set out targets for the production and use of renewable energy in territory aiming at maximising local production and reduce reliance on national grid. See representation above for considerations already embedded in the Future Chippenham Draft Concept Framework.

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?

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?

Measures to reduce transport carbon emissions can be considered in terms of three categories:

- 1) Avoid (reduction in energy demand) – reduce transport demand by reducing the number and/or length of trips;
- 2) Shift (reduction in energy consumption) – cause demand to shift from less to more energy and emissions efficient transport modes (i.e. primarily from car to public transport or walking/cycling or road freight to rail); and

3) Improve/Fuel (reduction in energy consumption) – improve the efficiency/emissions performance of the remaining fleet through efficiency improvements and/or changing energy source (electrification).

Measures for new development will need to reduce vehicle travel (to address congestion and energy demand) and ensure that remaining trips are undertaken by zero tail-pipe emissions vehicles (to address carbon and also local air pollution).

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?

The Council should develop robust evidence base to support the creation of planning policy to accelerate roll-out of EV charging points as a key priority. Research suggests that people are more likely to purchase an electric vehicle if charging infrastructure is already in place where they live, as it reduces the requirement to charge during the day. Non-residential, particularly workplace charging, also has an important role to play; as battery sizes increase, people will also become even less reliant on journey charging points, and it is likely that they will rely more heavily on their home or work charging provision. Understanding the costs of installing EV charging infrastructure will be an essential requirement in order to determine what the reasonable minimum and optimum requirements for provision in new developments might be, and therefore what standards can be set out within planning policies.

Future Chippenham Draft Concept Framework (Appendix A) proposals include section on Electric Vehicles and Car Clubs - Future Chippenham will promote the use of electric vehicles for residents. Provision will be made for reliable electric vehicle (EV) charging in both public and private parking spaces, including a significant proportion of rapid charging points, where possible this will be integrated into local renewable electricity generation. Affordable access to car clubs could be provided, which would be an attractive alternative to private car ownership.

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?

New development will require significant new power network infrastructure. From the outset, this should be delivered in a manner that allows investment in smart grids and energy storage as an alternative to larger traditional infrastructure.

Where new developments look to meet carbon targets by bulk, and off-site, use of renewable generation, these generators can be embedded in a shared Virtual Power Plant (VPP). This aggregates the smaller generators in a way that can enhance a development's market standing, and hence, possibly, its profitability.

Initial strategic engagement with Distribution Network Operators regarding the future development should happen in conjunction with the council, not simply by developers.

Close collaboration between developers, utility providers, and regulators will be required to ensure technical, financial and management models are developed to overcome barriers to delivery.

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?

Zero carbon living in energy production and consumption terms will require application of circular economy principles to new development through maximising recycling, reuse and composting in territory (with waste being viewed as a resource) with minimal associated carbon emissions and low and decreasing percentage of construction and operational waste sent to landfill or incinerated over the short to long term.

These considerations will impact design and viability of schemes as they will need additional space and investment, but they are a necessity to address the issue of depletion and over-consumption of natural resources.

Future Chippenham Draft Concept Framework (Appendix A) includes a section on Waste Infrastructure - All buildings and infrastructure would be designed and constructed to minimise waste and promote resource efficiency. This would help the move towards a Circular Economy in which resources are kept in use for as long as possible and maximum value is extracted from them before they are recovered at the end of their life and turned into new products and materials. Houses will have adequate internal storage, usually within the kitchen, for the segregation of recyclable and compostable or reusable materials from other waste. Outside the buildings there will be enough storage space for the required waste receptacles. Local waste management facilities will be developed or expanded to allow for integrated waste management that will be capable of dealing with waste streams that are sometimes neglected such as textiles. On site treatment of waste food can also be achieved, alongside garden waste, via anaerobic digestion and this could be linked closely to the energy infrastructure. Only non-recyclable or reusable waste, perhaps due to contamination, would be sent for incineration to enable energy recovery. All new waste infrastructure will be climate change resilient.

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

Rep ID: Climate173	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate173
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?	
<p>Yes. It is possible for the plan to reduce dependency on car travel and to ensure future development is net carbon neutral. This would be in keeping with the policies being pursued by the CTC Neighbourhood Plan (e.g. on climate change, sustainable transport and electric vehicle charging). Imaginative approaches to transport across Wiltshire such as developing and connecting new rail stations (Devizes Gateway, Corsham and potentially Hullavington) with frequent, reliable, low carbon road transport, park and ride etc. could make a real impact on reducing the use of cars in Wiltshire and relieving traffic pressure on Chippenham. Any new roads built must prioritise cycling over car use, as an incentive to travel by sustainable transport modes and reverse carbon emissions.</p>	

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

Please refer to CTC Neighbourhood Plan policies on carbon neutral development, sustainable construction, renewable energy, provision and enhancement of cycle paths, access to the bus network, electric vehicle charging infrastructure, biodiversity and green corridors as examples of policies I would like the Local Plan to emulate.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and policies such as the ones highlighted above. These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government and Wiltshire carbon reduction targets.

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

Avoid building on the low lying land adjacent to existing flood plains and within Flood Zones 2 and 3, and to reduce future flooding risk to other communities in lower parts of the Avon such as Melksham, Bradford on Avon and Bath

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?

Avoid building on land that will destroy natural capital, which is finite and irreplaceable, rather than trying to mitigate the consequences.

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?

I would endorse the UKGBC approach and use of sustainability statements suggested, which CTC is looking to adopt in its Neighbourhood Plan Carbon Neutral Development policy.

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?

By undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible (i.e. from 2023 or sooner). I would like to see this policy adopted immediately.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Please refer to the answer given to B4

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities

from exceeding this standard, which many are already doing through their local plan policies. Please refer to the CTC Neighbourhood Plan Carbon Neutral Development policy for further guidance.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It should have policies which support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps).

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?

All development should be required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset for any remaining operational emissions) with immediate effect if at all possible.

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. And accommodate future innovation in technologies.

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?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system support the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.” I therefore recommend that the Local Plan sets a net zero target based on an assessment of its carbon reduction potential and develops policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside sustainable development locations and carbon neutral development policy. A carbon inventory approach could be used to check progress

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?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production in conservation areas and listed buildings, providing they are sympathetic to their setting and significance, and this balance should be maintained.

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?

A local employment-led development approach, and supporting policies, would prevent large scale commuting and sustainable travel options within sites, and would reduce the need to use cars for local journeys. Employment development should be for high quality attractive jobs in order to minimise out-commuting and deliver the best value for our communities. Policies to control the use of wood burning stoves/heating in densely built-up areas would help reduce non-vehicular air pollution. Increasing modal shift to public and active transport will not be achieved with the 'business as usual' approach to delivering cycling infrastructure or bus improvements as previously seen in Chippenham. A comprehensive strategy for cycling, walking and public transport is needed to fully analyse current, future and potential demands, and to set out how continuous networks will be delivered. Even if this can

only be delivered at the cost of the loss of on-street parking or vehicle access. Unless sustainable transport networks can be established which are as quick and safe as routes for motor vehicles, modal shift will not occur. Whilst the shift to greener fuelled vehicles will in part improve local air quality through the reduction of emissions, it is not an all-encompassing solution to our problems. More than half of the UK's electricity is produced through non-renewable sources, and if electric vehicle uptake expands too quickly demand for power will in the short to medium term likely come from coal and gas. Electric cars still take up as much road space as petrol cars -meaning they will still cause congestion thereby making bus travel slower and less reliable. Electric vehicles will still sit idle in parking spaces on the side of roads for most of the day, limiting highway space which could be transferred to walking and cycling infrastructure, and results in severance for pedestrians and reduces the perception of safety for cyclists.

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?

Install on-street EV charging infrastructure throughout Chippenham and in other parts of the county (particularly larger market towns) as soon as possible. Whilst sustainable transport infrastructure can encourage some modal shift, it has to be complemented with travel demand management. Inexpensive and plentiful parking results in the use of private car being the easiest mode choice, even for basic trips. A policy is therefore required to seek a reduction in parking supply and an increase in the cost of parking. Should the distributor road that will serve the proposed development in the south and east of Chippenham be formally proposed in the Local Plan then supporting policies will be required which limit through-traffic within Chippenham by implementing restrictions to private cars, and to transfer existing highway space to cycle, walking and bus infrastructure. Consideration should be given to transport hubs at strategic locations, intercepting longer distance trips by private vehicle and providing sustainable means of onward travel to employment, retail, leisure and education.

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?

More local renewable energy generation and policies which support this. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively.

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?

Forward thinking policies of the type described above. Viability will quickly catch up.

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

Rep ID: Climate174	
Consultee code: General Public	Consultee Organisation (if applicable): CAUSE
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): CAUSE	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate174
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?	
<p>Yes, it is reasonable to expect the Local Plan to deliver carbon reduction outcomes in line with the national net zero target, with sustainable housing numbers in the right locations, backed up by polices that require net zero carbon development and sustainable construction and promote investment in renewable energy generation. In fact, it is a requirement of planning legislation and the NPPF that local plans are aligned with the Climate Change Act and the Government's net zero carbon by 2050, and 68% reduction (on a 1990 emissions baseline) by 2030, national target. This is a clear legal duty under Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to, climate change. In other words, Wiltshire's Local Plan not only has to "deliver outcomes that significantly reverse existing carbon emission trends before 2030" but needs to (as a minimum) align (and demonstrate this alignment) with these national targets.</p>	

In doing so, it will need to plan for genuinely sustainable development that is located so as to preserve carbon sinks, avoid climate damaging infrastructure and remove, rather than increase, reliance on commuting and private car dependency. It will also need to introduce net zero carbon development policies, to ensure there are no emissions and potentially negative emissions, associated with all new spatial development, which will have the added benefit of removing the need for costly retrofit in years to come. Wiltshire Council would do well to be guided by the letter it received from Client Earth in 2019 and the Climate Emergency Task Group's recommendations endorsed by Wiltshire Council's Environmental Select Committee In January 2021.

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of adopting such policies, including in reports such as The Cost of Carbon reduction in New Buildings (CSE, 2018). Moreover, determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. Planning Practice Guidance sets out useful sources of evidence such as national data on local greenhouse gas emissions and provides sources of evidence of how future patterns of spatial development can be designed to maximise carbon reduction potential by, for example, reducing the need to travel.

The requirement to deliver genuinely sustainable development through Local Plans will ramp up significantly in coming years and there is already evidence of the need for major infrastructure planning decisions to take account of the UK's legally binding obligations in relation to proposed expansion of airports (Heathrow and Bristol) and more recently England's road network, which has been called into question following the revelation of documents showing the transport secretary, Grant Shapps, overrode official advice to review Government policy on environmental grounds. The signs are that the Government is beginning to prepare to put its policy and public spending proposals through a net zero filter, which is exactly what Wiltshire Council needs to do in relation to the Local Plan.

With regards, urban regeneration and the development of brownfield sites; the NPPF states that "planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses," and that "strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land." Also that strategic policies should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land," and "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops...)"

This aspect of the NPPF and the contribution that brownfield land could make to housing numbers seems to have been completely overlooked in these proposals, being regarded as low priority and "windfall". The fact is that significant numbers of dwellings are possible within existing parts of Chippenham, which could reduce the need for damaging greenfield development

and would deliver affordable apartments, without damaging the environment, without the need for cars, and with the added bonus of helping keep the town centre alive.

With regards other aspects of land use; no attempt seems to have been made to assess the value of existing farms, their contributions to public benefit or their future potential in the Plan period. This serious shortcoming is embedded in the construction and application of the site selection criteria. For the 'preferred sites' for Chippenham, for example, the Interim Sustainability Appraisal (Section 5.2.5) simply comments that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality," ignoring the fact that there is a significant amount of Grade 2 and 3A (the Best and Most Versatile) land. Similarly, there is no consideration of farmland (or its use for local food production, tree planting or renewable energy generation) as an alternative or any value placed on the loss of such. Neither is its value considered in terms minimising vulnerability to surface water flooding or locally valued landscapes, or in relation to the landscape aim to "conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place" and "minimise the impact on locally valued landscapes".

Well managed farmland with community connections also has the capacity to contribute positively to achieving carbon reduction targets as well as "healthy and inclusive communities," but this seems to be neither recognised nor evaluated. The lack of attention to the current and future benefits of farming and the costs of its loss is further exemplified in the Empowering Rural Communities document, in which the words "farm" and "farming" are completely absent. This lack of attention to the value and negative impact of potential farmland loss is a serious weakness in the land use policies which underpin the site selection process and conclusions. Moreover, this is contrary to the expectations of para 170 of the NPPF which states that "Planning policies and decisions should contribute to and enhance the natural and local environment by... (b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."

All of the above underlines the unspecified (and hence unaccountable) balance of qualitative judgements and evidence contained within the Interim Sustainability Appraisal, which is seriously deficient, yet used to as a justification of the site selections put forward in the Spatial Strategy.

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

Despite warm words in its climate change paper, and its Climate Emergency declaration in which the Council commits to seek to decarbonise the county, Wiltshire Council's current Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come (i.e. precisely the opposite). To deliver outcomes that significantly reverse

existing carbon emission trends, the planners need to radically change their approach to reduce car dependency and ensure future development does not increase, and ultimately reduces, carbon emissions (e.g., through renewable energy generation and carbon sequestration).

For Chippenham, this would mean a local employment led plan that radically reduces the need for additional commuting. It would mean abandoning a strategy for unsustainable growth that simply attracts relocation from along the M4 corridor, with its associated dependency on commuting. It would mean housing numbers that genuinely meet local needs, and not exceeding Chippenham's current growth (based on in-migration) of 250-300 people per annum (as measured by the ONS), which equates to 2,500 houses (at most) for the Plan period. And it would mean maximising regeneration and brownfield development (and including this in the housing numbers).

A plan with these lower housing numbers and brownfield development focus, would not require an extensive distributor road with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a massive associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future. Nor would the Plan embed vast quantities of emissions for years to come as a result of the commuting that will inevitably result, as has happened with previous urban expansion of the town, causing the current level of congestion and tailpipe emissions.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, would go a long way towards reducing commuting and private car dependency. More innovative approaches to public transport, including rail (e.g., new stations at Devizes, Corsham and potentially Hullavington) could help reduce the need for remaining necessary longer journeys by road. Genuinely sustainable transport policies, promoting investment in active travel and electric vehicle charging infrastructure, would help reduce emissions from shorter journeys in and around the local area. Net zero carbon development policies, and related policies to promote local renewable energy generation, of the type being put forward by the Chippenham Neighbourhood Plan, would mean no additional emissions for the development itself.

The Local Plan should also seek to maximise the value of existing farmland in terms of carbon capture, particularly its own farms where it has direct influence over the land and the way in which it is managed. It should plan for a future which encourages progressive agroecological and regenerative methods that promote carbon sequestration and storage

<https://www.agricology.co.uk/farming-themes/agroecological-approaches/biodynamic-farming> and learn from the example of leading agro-ecological farms such as the one in nearby Yatesbury, only 12 miles from Chippenham <https://yatesbury.webs.com/>.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and net zero carbon development/sustainable construction/renewable energy promotion/sustainable transport policies such as the ones highlighted above and recommended by the Climate Emergency Task Group. These should be measured in terms of their net carbon emissions over time and adjusted accordingly in

line with Government's and Wiltshire Council's carbon reduction targets.

The Local Plan itself should establish its carbon reduction potential and targets for net zero carbon development (as recommended by Client Earth), including preventing emissions being generated as a result of:

- destruction of natural capital and removal of carbon sinks;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport mileage as a result of car dependency and commuting;
- operational emissions resulting from new housing and business/industrial premises;

and avoiding emissions as a result of:

- local employment led development;
- highest possible standards of building insulation (for domestic and commercial);
- integrated and stand-alone renewable energy generation;
- innovative and progressive farming methods;
- investment in infrastructure to support active travel (for short journeys) and public transport;
- investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites at the outset. No sites should be designated as 'preferred' until such time as the climate change implications (including estimated net carbon emissions) have been calculated.

The farms in Site 1 (and elsewhere) should be retained and measured in terms of their net carbon emissions over time and policies adjusted accordingly in line with national and Wiltshire carbon reduction targets.

A means of monitoring the implementation of the Plan policies that drive the carbon reduction should be established alongside the Plan.

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

The measures do not go far enough. As stated in the LPR Interim Sustainability Appraisal report, flood risk will be exacerbated by climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g., to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g., of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage scheme (SUDS) solutions to mitigate flood risk that is avoidable in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

From a sustainable water management perspective, Site 1 is in a Groundwater Source Protection Zone (i.e., a zone in which there is a risk of water source contamination), which brings into question the wisdom of have extensive housing development, employment sites and road in terms of polluting groundwater used for potable water supply.

Sustainability Appraisal Appendix 2 criteria 3

This site is entirely covered by Source Protection Zone 2c, which is an extension to the Outer Protection Zone. Therefore, it does not require an assessment as to whether it poses an unacceptable risk to the source of supply. Some zones are extended because activities below the surface, such as deep drilling, could create pathways for pollutants to enter the groundwater. Zone 2 is defined by the 400-day travel time from pollutant to source. The 400-day travel time is based loosely on consideration of the minimum time required to provide delay, dilution and attenuation of slowly degrading pollutants. The site is not covered by Drinking Water Protected Areas or Drinking Water Safeguard Zones. In line with the provisions of local planning policy and the Water Framework Directive, the development of this site will need to make suitable provision to protect and, where appropriate, improve local surface, ground and potable drinking water quality – this includes ensuring that enough buffer zones are located adjacent to watercourses and ensuring that runoff does not enter these watercourses.

Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which Sustainable Drainage systems can be used, may be affected.

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?

The question is based on a false premise, since natural capital would not be enhanced by any of the proposed development, and would be spectacularly damaged by siting development to the East of Chippenham in the Avon and Marden valley. Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the loss of natural capital caused.

It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed development would destroy.

The question misses the point completely in that successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state. In terms of how to limit the destruction of natural capital that the spatial strategy would destroy; a starting point would be to estimate the value of natural capital that would be lost on the proposed sites so as to be transparent about the damage to the climate and environment that would result if the current Plan proposals were implemented. This would support the case for lower numbers of houses, less infrastructure intensive development and selection of sites on which the destruction can be limited. Since there are no questions about biodiversity impacts, comments have been added at the end of this section on the impacts on wildlife habitats and protected species that would occur if sites 1 and 2 were to be developed.

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?

The measures set out do not go far enough. The adoption of policies that require net zero carbon development in line with the UKGBC approach, and the promotion of renewable energy generation are important and necessary. However, they are necessary but not sufficient and their benefits would be wiped out completely by an unsustainable spatial strategy that substantially increased emissions by:

- release of huge quantities of carbon through the excavation of rich organic soils;

- removal of existing and future carbon sinks;
- construction of carbon intensive infrastructure (included embedded emissions in materials such as concrete and asphalt);
- additional transport mileage as a result of new commuter extensions.

In other words, planning for net zero requires both sustainable housing numbers, a sustainable spatial strategy and sustainable (net zero development and renewable energy generation) policies, to have any chance of meeting the Government and Wiltshire's net zero targets.

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?

It is possible to have a net zero carbon development policy that would ensure net zero operational emissions for all the allocated sites in the Local Plan, as is already the case for some adopted Local Plans and other LPAs are doing in their emerging plans. This should be backed up by strong sustainable (low carbon) construction and renewable energy generation policies. These policies will not, however, prevent the destruction of carbon sinks or require the lost sequestration is compensated. Neither will they prevent the transport emissions that results from poor spatial planning and place shaping, the negative effects of which could wipe out the positive effects of such policies.

With regards achieving net zero carbon new development; by undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible, given that Core Policy 41 has been abandoned and the badly insulated houses being given permission at present will all need to be retrofitted in future.

However, as stated above, a net zero carbon development policy is necessary but not sufficient to achieve a carbon neutral or carbon negative Local Plan. Such a Plan also requires that development is only allowed in locations that do not significantly undermine the Government's (and Wiltshire Council's) carbon reduction (net zero) targets. Hence, the spatial strategy itself needs to be net carbon neutral, focused on providing housing where there is employment (to be 'employment led'), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging infrastructure (and locations that require this) and removing rather than increasing dependency on private cars to get around.

The current proposals would unnecessarily destroy natural capital/carbon sinks and increase transport emissions through commuting, whilst bearing no relation to local employment or local housing need, which would be better achieved through urban

regeneration/brownfield sites. The latter would provide affordable housing (e.g., apartments), reduce the need for cars and help rejuvenate the town centres of principle settlements and large market towns that are in danger of being doughnuted (i.e., having suburbs supported by in-migration and out-commuting, that are disconnected from town centres, with separate shops and services, leading to further deterioration of town centres, vacant shops, and unused town centre facilities).

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. There is considerable evidence for the viability net zero carbon development polices in Local Plans (please refer to the Centre for Sustainable Energy for examples and background papers). The need for net zero carbon development is set to increase in future, as the Government requires planning decisions to prioritise climate change considerations. Viability will become a secondary issue as policy and legislative requirements ramp up. Once net zero carbon development policies become more mainstream, additional cost will no longer be material.

Wiltshire Council needs to worry less about viability, accept the inevitable changes that are coming and focus on:

- developing a carbon neutral spatial strategy;
- putting a robust net zero carbon development policy in place;
- actively promoting renewable energy development, including on its own farms (and using these for food production/tree planting and renewable energy generation rather than selling for short term financial gain);
- putting policies in place to promote the transition to ultra-low emission vehicles (waking up to the fact that electric vehicles as will be the norm by the end of the Plan period).

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which several leading local authorities are already doing through their local plan policies.

In addition to decarbonising its spatial strategy, the Council needs to put in place a policy that requires all development be net zero-carbon, in line with the UK Green Building Council's Net Zero Carbon Buildings Framework Definition. This would require all development to achieve an annual operational net zero carbon emissions balance by:

- prioritising energy efficiency through the building fabric;
- reducing the remaining energy demand through on-site renewable energy and heat (e.g., rooftop solar PV and/or air or ground source heat pumps); and
- compensating for the residual carbon emissions via a carbon offset fund, into which developers are required to pay a value agreed at the application stage, to deliver carbon savings which would not otherwise have been made (ensuring additionality).

The Building Research Establishment's BREEAM offers a range of sustainability assessment methods and standards for master planning projects, infrastructure and buildings from new construction to in-use and refurbishment, which can be used in guidance to supplement an overarching net zero development policy in relation to individual (particularly commercial) buildings.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

This could be done via a policy to support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g., solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning requirements, although this would make a small difference in terms of overall impact. It is unclear what the Local Plan could do, if anything, to promote the retrofit of existing buildings, which needs to be a priority for Wiltshire Council to address, and would make a substantial difference in terms of reducing carbon emissions.

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?

The key element that is missing (in so far as it isn't even raised or has any questions on) is the overarching proposed housing numbers and spatial strategy. Other Local Plan policies could be regarded as sticking plasters for a strategy that imposes an out-dated model of in-migration, car dependency and the destruction of natural capital, carbon sinks and productive farm land, all of

which are critical to reaching net zero and preventing devastating climate change. It has already been established that the proposed excessive housing numbers bear no relation to local housing need or can be supported by local employment, which would allow people to not have to commute. In other words, the entire Plan is based on an unsustainable approach that sets itself up to fail in terms of carbon reduction and the Government's and Wiltshire's net zero targets.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e., at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Once the Plan has begun to address the fundamental issues above, it almost goes without saying that its Local Plan policies need to ensure emissions from any development that takes place are neutral or negative.

Planning policies should require that:

- All development (housing and commercial) is obliged to meet net zero carbon standards in line with the UKGBC approach (i.e., energy efficiency, on-site renewable energy and heat generation and carbon offset through off-site renewable energy generation for any remaining operational emissions) as soon as possible;
- Promote renewable energy generation, such as solar and wind on suitable sites, identifying Wiltshire Council land (including sites within farms/County Farms) to contribute (e.g., through Local Plan Development Orders) and working closely with Neighbourhood Plans in identifying other locally preferred, suitable sites;
- Sustainable (low carbon) construction, including embedded carbon in materials such as concrete, aggregates, plasterboard and tarmac, procurement of products and services involved in construction and the transport and on-site activities associated with the construction itself;
- Planning policies should stop any further installation of natural gas for heating and cooking ahead of it being completely phased out in new homes from 2025 and support the transition to renewable heat such as air and ground source heat pumps;
- require the installation of EV charging infrastructure in anticipation of the cessation of petrol and diesel vehicle sales from 2032 and the transition to EVs over the course of the Plan period;
- set water efficiency standards to help reduce emissions from energy used in pumping.

The carbon emissions associated with the emerging Spatial Strategy should be calculated in advance, including the emissions associated with different site options, to enable a transparent planning process and informed decisions to be made about housing numbers and potential development site locations.

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

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. This would allow for future innovation and adaptable approaches, which could help a faster transition to net zero. Working with communities, including for example community energy organisations, will be an important aspect, helping to ensure renewable energy generation is suitably located and recycling benefits directly back into the local economy/community.

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?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system supports the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.”

The Local Plan should therefore set a net zero target based on an assessment of its carbon reduction potential and develop policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside a genuinely sustainable Spatial Strategy and carbon neutral development policies. Separate interim targets could be set for the generation of renewable energy during the Plan period, consistent with the overall net zero target.

These would need to be ambitious and regularly reviewed, since early investment/front end loading will be critical given the amount of time it takes to develop proposals and the planning application process. In other words, the net zero target will be much more achievable if emissions reductions begin early and the large-scale investments needed are delivered in the early part of the Plan period.

Measuring progress will also be important and will require a baseline and means of updating. This should be relatively easy in relation to any significant ‘ground mounted’ renewable energy generation sites. Whilst more challenging to keep track of domestic and commercial renewable energy and heat generation, there are an increasing number of more sophisticated tools that can be used, such as the community-scale carbon footprint tool developed by the Centre for Sustainable Energy and Exeter University.

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?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra- low carbon or zero carbon forms of energy generation. This includes in conservation areas and listed buildings, providing they are sympathetic to their setting and significance but enhancements could be made to the latter. The main imperative for Wiltshire Council is to promote retrofit of existing buildings throughout the county, which is beyond the scope of the Local Plan to influence as far as we are aware. The Local Plan priority should be on sustainable housing numbers in sustainable locations that don't destroy carbon sinks and promote commuting, backed up with net zero carbon development, sustainable construction and renewable energy policies, including LDOs for suitable Wiltshire Council farms, such as the ones in Chippenham.

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?

The paper states that “the Council considers that increasing the level of self-containment within Wiltshire’s settlements offers the best solution for tackling unsustainable, carbon-based travel patterns.” It further states that “to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles.” Despite this, its spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution, as a result of increased commuting and localised travel for many years to come.

A more organic growth/local employment-led development approach, with supporting policies, would prevent large scale commuting and associated air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys.

Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work, thus reducing air pollution associated with a daily commute. This is particularly acute in towns like Chippenham and Melksham where thousands of vehicles drive through all parts of the town to the A350 and up to the M4 and onwards to their

places of employment, contributing substantially to air pollution at peak periods, which also coincide with children walking to school and breathing in the NOx gases and particulates.

The currently proposed excessive housing numbers and spatial strategy would simply add to this air pollution and damage to young people's health, as well as creating even more air pollution in town centres, as a result of all the additional vehicles associated with the urban extensions. Taking Chippenham as an example, the 7,500+ houses and associated suburbs to be built in open countryside, resulting from the HIF funded road bid dictating the spatial strategy, would generate potentially 15,000 more cars and vans, the vast majority of which would drive into Chippenham or Calne to access shops and services, creating even more air pollution and the need for Air Quality Management Areas (AQMAs) in both settlements. We already see this pattern in the most recently built estates at Cepen Park North and Cepen Park South, with no reliable regular bus services to offer any alternative, and few people cycling into town. The air pollution caused would run counter to Wiltshire Council's own Air Quality Strategy and hugely undermine all the efforts taken to improve air quality thus far.

Policies to control the use of wood burning stoves/heating in densely built-up areas are needed reduce non-vehicular air pollution, which seems to be a growing problem in residential areas in Wiltshire, affecting young people's health and future disease (asthma, lung and heart related) exacerbation in particular. This sort of air pollution would be made worse by the proposed development on sites 1 and 2.

If Wiltshire Council is serious about addressing air quality, it needs to completely reassess its approach to housing expansion and come up with a Plan that reduces tailpipe emissions (and tyre and brake pad pollution) not increases them. The Council also needs to include a comprehensive strategy for cycling, walking and public transport to mitigate existing air quality issues and mitigate remaining additional air pollution that would result.

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?

An employment led spatial strategy would significantly reduce the amount of commuting and dependency on private cars. Policies that promote (preferably ultra-low carbon) public transport and active/battery enhanced active travel will then reduce the need for local car travel/dependency. This will require policies that create dedicated, fast and safe cycle routes of the type common in other European countries, and a few parts of the UK. Policies should also promote integrated public transport that improves reliability and increases usage, and further reduces car dependency.

Policies also need to promote the installation of on-street EV charging infrastructure to enable people who don't have off street parking to charge their EVs.

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?

More local renewable energy generation and policies which support this will help overcome this challenge. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively. Distribution Network Operators (currently transitioning to being Distribution System Operators, with wider responsibilities for the distributed grid) are keen to work with Local Authorities in developing their local networks to meet a net zero carbon future. Government money is available for investing in this grid infrastructure and Wiltshire Council needs to work with the DNOs/DSOs to ensure Wiltshire gets the grid investment needed to achieve net zero for our county. The main focus should be on upgrading grid capacity and infrastructure in the right places to enable renewable energy generation, EV charging and any other investments needed to help deliver net zero via the electricity distribution network.

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?

Much of this has already been covered (e.g., see comments on viability above). Wiltshire Council needs to develop a Plan for the 21st Century and stop resisting taking the necessary measures. The way forward is to:

At a strategic spatial planning level:

- Reduce housing numbers to a sustainable level that will allow net zero emissions to be achieved;
- Develop a genuinely sustainable spatial strategy that does not promote and is not dependent on commuting;
- Reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- Take an employment led approach (not a housing led one that works against achieving net zero targets);
- Measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- Develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- Place proper value on natural capital and account for it in the Plan; and

At a policy development level:

- Develop and implement net zero carbon development policies and low carbon, sustainable construction policies;

- Develop and implement supportive renewable energy development policies, including policies that identify and enable renewable energy generation within council farms;
- Develop and implement supportive EV infrastructure policies;
- Work closely with the DNO/DSO in developing the necessary distributed grid to enable net zero to be reached as quickly as possible;
- Develop and implement supportive integrated public transport and active/battery assisted travel infrastructure development policies to discourage car use for short journeys.

The current proposals work in the opposite direction, particularly in terms the higher-level strategy, which seem to be driven by road building and a focus on commuter housing. With forward thinking policies of the type described above, design will take care of itself (the skills, knowledge and technology are already out there) and viability will quickly catch up. The key message is to be clear about the overarching objectives (net zero) and get the fundamentals right (i.e., do not plan for unnecessary, unsustainable and potentially undeliverable numbers of houses in order to create large commuter extensions that lock in transport emissions, destroy valuable farmland/wildlife habitats/carbon sinks, and take a lead from other LPAs on introducing net zero carbon development and effective renewable energy policies). The rest will follow.

Bees are critical for pollination of food crops [see Climate174 for image]

Ecological and biodiversity impacts

i.Great Crested Newts

Development of sites 1 and 2 would impact a population of great crested newts, the main areas of concern being:

Habitat Availability - a search of ordinance survey maps encompassing the widest proposed route through to the built environment of Chippenham was undertaken to take account of each of the proposed route and surrounding development. In this search area there are a total of 24 recorded ponds each of which have the potential to provide opportunities for breeding great crested newts. These ponds are largely clustered at the east of the search area where there are three confirmed records of great crested newts. The distribution of these ponds in addition to the confirmed populations in the immediate vicinity gives rise to the serious risk of directly harming newts and/or degrading their habitat quality in contravention of The Conservation of Habitats and Species (amended) (EU Exit) Regulations 2019. All three of the proposed routes are close enough to the identified ponds to have potential impacts on newts should they be present. Insufficient data exists to conclude no impacts in this respect. To the west of this search area, an EPS Licence for great crested newts has been granted, indicating that a further or continued extant metapopulation is present at the western extent of the proposed road, further highlighting the risk to this species.

On top of the main search area an additional 2km in all directions was searched. This returned a further 76 ponds. The presence of these ponds and abundance of surrounding greenspace indicates wider suitability for this protected species in and around

Chippenham. Confirmed records of great crested newts additionally exist to the south, south west and south east outside of the search area.

In short, the proposed development and associated roads would cause direct habitat loss and habitat degradation for this species in the long term, with short term impacts including disturbance, injury and death during works in the construction phase.

Habitat Connectivity and Quality - Great crested newts disperse over land to travel between breeding ponds of the wider metapopulation. This requires connected habitats to allow safe and successful dispersal. In its current state the search area and surrounding habitats are well connected via grasslands, hedgerows, and woodlands. This allows free movement of individuals between ponds in existing populations.

By developing a significant road and housing development where newts are present, a new and potentially harmful barrier to dispersal is introduced into the environment. Mortality of amphibians associated with large infrastructure is widely documented, including fast- and slow-moving roads alike, such as those proposed around Chippenham. Records of great crested newts are present to both the north and south of each of the proposed road routes, therefore each route presents a significant barrier to dispersal between northern and southern sub-populations, essentially isolating the northern subpopulation of great crested newts by encircling them in a limited expanse of greenspace. This, in combination with the proposed increase in residential developments (direct habitat loss and short-term harm) will put substantial and significant strain on a protected species by limiting gene flow through the population, reducing breeding success and reducing quality of and availability of foraging and breeding habitats.

In addition to the above the remaining ponds to the north of the road will likely be subjected to degradation in quality through polluted road and surface water run-off. An increase in nitrogen content would also be anticipated (i.e., reduction in water quality) due to increased human activity in the area due to the increase in residential developments, and reduced availability of permeable ground. These factors combined have significant potential to alter the character of the ponds, including flora and fauna associated with them. This will reduce the potential value of the ponds by influencing the existing faunal and floral communities and subsequently reduces the breeding success of newts. This could ultimately result in the local extinction of great crested newts to the north of the proposed roads.

Translocation – whilst a translocation of great crested newts is offered as an option to mitigate for the harm expected from one of the road routes (though in reality would be required regardless which route was adopted), it should be stressed that a translocation has the potential to spread diseases and pervasive plants associated with pond life e.g., chytridiomycosis, duck weed, *Elodia* sp. Etc. and should only be used as a last resort, even if practically possible in these circumstances.

Significantly more information is required to assess the actual impact the development proposals would have on great crested newts. A population assessment should be undertaken to determine the anticipated impacts associated with all three routes. It is naïve and negligent to assume absence of newts in either case when there is significant potential for harm associated with these proposals.

ii. Bats

Of particular concern regarding these proposals is the potential they have to impact common and rare bat species, to which no consideration has been given. All species of bat are protected under The Conservation of Habitats and Species (amendment) (EU exit) Regulations 2019, which provides protected status to the bats themselves, their roosting sites and their foraging and commuting habitats.

Foraging Habitat - the western extent of the proposed road sits between 4-5km to the east of Bath and Bradford upon Avon Special Area of Conservation (SAC) which has direct habitat connectivity to Chippenham via a network of hedgerows, woodlands and a vegetated railway line. This SAC is a statutory designated site identified as being of international importance for bats. It is known to support up to 15% of the UK population of greater horseshoe bats during the swarming and hibernation seasons, with other rare species recorded including Bechstein's bats, lesser horseshoe bats and barbastelle. At least one maternity roost of greater horseshoe bat is known to be present within the SAC with more likely to be present indicating of year-round use of the site. These roosts are of high conservation significance and are frequently recorded within the SAC and its surrounding environment. The NPPF indicates that applications should be refused where impacts are anticipated on SAC's and their ecological receptors, which these proposals will likely do (Section 15 paragraphs 175 and 176).

Conservation of greater horseshoe bats is of particular concern with these proposals given their 90% decline in their native UK range over 100 years. Distance travelled from the roost is key in this case, with greater horseshoe bats known to travel 4-5km for foraging purposes. Given this, and the proximity of Chippenham to this SAC, there is a very high chance that farmland around Chippenham will be of value to foraging greater horseshoe bats. Ideal foraging habitat is cited as being a mosaic habitat of cattle grazed fields with pockets of woodland, which is typical of the wider Chippenham area and will be directly lost to the proposed roads and associated residential development. When considering the additional pressure of increasing volume of residential development in addition to the road itself and associated traffic on what is currently highly suitable foraging habitats there is likely to be a significant adverse impact on this species. Proposals for the various schemes indicate that up to 800 hectares of quality foraging habitat will be put at risk as a result, for which no mitigation has been proposed. This is in contravention of The Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019, which affords protected status to the bats themselves as well as their roosts and foraging and commuting habitats.

It should also be noted that bats will be using the search area for foraging purposes from much nearer roosting sites. For example, immediately north of the search area at the southern extent of Chippenham a granted EPS licence for a works around a lesser horseshoe roost is known. Individuals and colonies of bats in these areas will rely heavily on the immediate surrounding countryside for sustenance and greater consideration must be given to this.

Habitat Connectivity - the majority of summer roosts of greater horseshoe bats are located within 20km of the winter hibernaculum therefore it is a fair assumption that commuting bats will be using the railway corridors, river and brook corridors, cycle path corridor, hedgerows, woodlands and tree lines to commute between the winter hibernacula and the summer roosts.

Similarly, Bechstein's bats have a catchment area of approximately 20-30km for their swarming sites indicating the potential importance of the commuting corridors on their breeding success. Disrupting these flight paths will be highly detrimental to the widespread success of these species over a far wider area than just Chippenham, with consequences likely to be felt over a much wider zone of influence. Such disruption comprises the direct impact of habitat removal and/or degradation due to pollution etc., but also the major potential impact of artificial lighting due to encroachment of development and roads further and further into the countryside (over habitats noted as particularly important for the conservation of greater horseshoe bats).

All species of bat are nocturnal however greater and lesser horseshoe bats are noted as being particularly light averse, therefore increased artificial lighting anticipated as a consequence of the development proposals will reduce the value of their existing commuting corridors and foraging territories. Even low levels of lighting will deter these species, and strategic lighting strategies are not capable of fully mitigating for the increased lighting associated with the new residential areas and street lighting on the expected scale of these proposals (e.g., increasing sky-glow and conspicuous points of origin). This puts these light-averse species at a competitive disadvantage to more light-tolerant species in a region of the UK considered to be the stronghold for the remaining population of greater and lesser horseshoe bats.

It should be stressed that the commuting and foraging habitats of these species are protected under the same legislation as the roosting sites and cannot be dismissed given the highly damaging consequences on rare species. The NPPF (Section 15 paragraph 180) indicates that developments should be suitable for their locations, specifying that light pollution for nature conservation must be considered. In this case this policy is of particular importance given well documented detrimental impact of artificial lighting on these highly rare species near an SAC designated for these same species.

The potential impacts outlined here detail the concerns relating specifically to greater horseshoe bats and Bechstein's bats, however the same issues will be experienced by all species of bat known in the locality of which there are many – a data search with Swindon and Wiltshire Biological Record Centre will show more detailed information, including many uncommon and extremely rare species, which are known to be present in roosts of high conservation status.

iii. Birds

The impact of the proposed roads and associated development on birds must also be considered, with the loss of habitats expected to be detrimental to populations of resident and migratory species alike including IUCN red and amber listed species. Agricultural land such as that anticipated to be cleared provides essential resources for winter visitors such as fieldfare and redwing, and summer migrants such as lapwing, which are all known to be present in the area. It can also form a foraging resource for raptors including barn owl, little owl, kestrel and buzzard as some examples. Riverine species will likewise be impacted, with little egret, kingfisher and grey herons known in the area.

The detrimental impact of roads and traffic on birds is well documented, with many species sensitive to the disturbance associated with them often as a result of increased noise and vibrations. In many species this results in reduced foraging success, reduced nest success and reduced population density, with the impact felt more heavily by shy and less common

species. Similarly, the installation of the aqueducts will require a significant quantity of work over a prolonged period at the bank of the river. Various water fowl will likely be affected by such works by deterring breeding attempts in the area and destruction of suitable foraging and nesting habitats.

Mortality of birds on the road upon completion will also be expected. Young barn owls in particular are vulnerable to traffic as they migrate away from their nests, though all local species will be at increased risk. Protected species will be put under pressure as a consequence.

Further information needs to be provided to determine the extent to which avian communities can be expected to be impacted by the road proposals given the diverse use of habitats employed by each species. Moreover, the cumulative impacts of the road and residential schemes that are proposed must be considered in tandem to fully account for the overall impacts that will be felt. Breeding bird surveys and winter bird surveys should be carried out, however to date no information has been provided. This should be carried out in sufficient time to inform site selection.

iv. Hazel Dormice

Hazel dormouse has potential to be disproportionately affected by these proposals. Records of hazel dormice in the area are slim, however a granted EPS licence from 2014 for hazel dormouse located to the south west of Chippenham demonstrates that they are in the area, therefore must be fully accounted for in any development proposals. Dormice are primarily an arboreal species which rely heavily on having a continuous network of interconnected branches to survive and as such are typically found in hedgerows and well-connected mature woodlands with a diverse species composition to provide year-round opportunities and a well-structured understorey. Due to their arboreal nature their dispersal capability is heavily reliant upon the connectivity in their environment, particularly in large infrastructure projects where a large number of hedgerows and tree lines can be expected to be perforated.

Much in the same way that great crested newts will be impacted, any hazel dormice on the Chippenham side of the proposed road will be isolated from the wider environment. This will limit gene flow through the population, reduce opportunities within the wider landscape and fragment habitats which are currently well interconnected. Mitigation for this species is not straightforward and can be very costly due to the highly specific habitat requirements for supporting a population as outlined briefly above. Hazel dormice are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, providing protected status to the dormice and their habitat, which must be protected in line with this legislation.

The status of hazel dormouse should be properly established to accurately determine the impact this road could have on any local populations, particularly given their reliance on unbroken networks of woodland and hedgerows.

Terrestrial Habitats - the implementation of a new road will invariably contribute to both air pollution and nitrogen deposition into the soil in areas currently free from such pressures, including Bencroft Hill Meadows SSSI, which is an unimproved neutral lowland meadow which supports highly sensitive botanical communities which are vulnerable to nitrogen deposition. Increased

soil nitrogen puts these rare communities of plant at a competitive disadvantage compared with common ruderal species known to outcompete rarer plants under nitrogen rich conditions such as common nettle.

Unimproved lowland meadows are a particularly rare habitat type in the UK given the extensive agricultural history of the country and are included as a Priority Habitat under the Natural Environment and Rural Communities Act (2006). Measures must be taken to ensure that valuable habitats such as this SSSI, but also vulnerable woodlands and watercourses are fully accounted for in this scheme.

It should also be noted that sites like Bencroft Hill Meadows SSSI and other such local wildlife sites will be subject to a much greater visitor pressure as a result of a net gain in households in areas currently comprising greenfield land which could easily result in soil compaction and trampling, which many of the rarer species recorded in the area are unable to recover from.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. Biodiversity net gain would be significantly more difficult to achieve as a result. The DEFRA Metric 2.0 should be used to measurably demonstrate the impact these proposals would have, and where net losses are predicted consent should not be given.

The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF Section 15 Paragraphs 170, 171 and 175.

v. Rivers and watercourses

There is the potential that development proposals will impact upon the River Avon and smaller waterbodies in the area. Polluted runoff from the proposed road will be unavoidable, with fuel, oil and particulates at some stage making their way through to the watercourses through entering groundwater or via surface water runoff. This type of pollution is widely documented to have a damaging effect on water quality and subsequently the flora and fauna associated with the rivers.

There will be an inevitable increase in total surface run off as a consequence of increased sealed surfaces associated with the road and residential developments. Whilst the road proposals indicate that clear span-type aqueducts will be used to avoid impacting the flood plain, no mention is made of how the increased runoff would affect the river character (i.e., increased water speed and/or levels, water acidity etc.), and how this might subsequently impact resident wildlife. For example, otters are known to use the Chippenham stretch of the River Avon and are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Further records exist in nearby areas including Corsham, and an otter roadkill was identified in Chippenham Town Centre, therefore their presence is widely documented in the area. The potential change of river character, disturbance from extensive and prolonged works and residents, in addition to an increased potential for fatalities on

the roads over the long term will increase pressure on another protected species which has again been left unmentioned in the proposals.

There have been several sightings of otters on the River Marden, e.g., the River Marden Ecological Appraisal commissioned by Bremhill parish council in Sept 2020 has in paragraph 3.2.6 - Otter, water vole and widespread species of mammal Signs of otters were recorded in one location (see Target note 9. above), though it is considered likely that there is otter activity in other sections of the river due to the presence of large areas of suitable habitat. In particular, otters are highly likely to be present in the area near the confluence with the River Avon as the habitat is ideal for otters here.

River Marden 1 [see Climate174 for image]

The river Marden is also likely to be impacted by the work proposals. Significant work has been put into restoring the river Marden for the benefit of biodiversity, including targeted methods for improving habitats for brown trout which are known to be threatened. A publicly available survey report from 2015 indicated that's the river Marden was failing with respect to its target condition by having exceeded its target level of pollutants. Remedial works may since have been undertaken, however by increasing human activity in the region between Chippenham and Calne existing measures are likely to become insufficient, and would serve only to increase the pollution levels (including phosphates) in the river. This threatens all users of the rivers and reduces its suitability for brown trout and other such fauna. No monitoring or mitigation has been proposed for this, nor any commitment to its prevention been indicated.

More consideration must also be given to wider aquatic fauna including other species of fish, white clawed crayfish (if present) and the many aquatic invertebrates which support the river system and the wider riverine food web.

Further comments

In December 2020, the UK committed to a nationally declared contribution of a 68% reduction in greenhouse gas emissions by 2030 for the latest iteration of the Paris Accord, with a reference year of 1990. Wiltshire Council has made no attempt to calculate its own contribution to that target. It has no idea what its levels of GHGs were between 1990 and 2019, or even between 2019 and 2021. It has not even confirmed that its target date for net zero would be in line with the IPCC's special report on the impacts of global warming of 1.5 °C <https://www.ipcc.ch/sr15/> or the UK Committee on Climate Change definition of net zero.

It has no base line against which future emissions can be measured and therefore no way of determining the contribution the Local Plan can potentially make or the relative impact of the current Local Plan proposals on the county's overall emissions reduction (or in the case of the version before us, the substantial increase in emissions that will take us in the opposite direction).

Wiltshire Council has admitted that use of "the government backed SCATTER [Setting City Area Targets and Trajectories for Emissions Reduction] tool does not produce a reliable estimate of greenhouse gas emissions for rural counties like Wiltshire but, unlike other baseline measures of the county's greenhouse gas emissions seems to be symptomatic of this.

Wiltshire Council seems to be planning to grow Chippenham through a housing led strategy with no regard for the consequences (intended and unintended) of failing to ensure that the growth of the town will not compromise the climate, environment and

overall health, wellbeing and security of its citizens in the near and medium-term future. rural local authorities like Cornwall, has not developed or implemented another method.

Wiltshire Council's Global Warming and Climate Emergency Task Group has - published two reports (the first in September and the second in December 2020), the second of which includes robust, evidence-based recommendations on planning, which Wiltshire Council's Cabinet has pushed back against, rather than embracing.

The document entitled Wiltshire Council Looking to the Future: Addressing climate change and biodiversity net gain through the Local Plan—raising the ambition (January 2021) includes many of the key themes that the Task group has made recommendations on yet fails to propose how these themes will be addressed by the Local Plan.

Not only does this call into question the premise on which the Local Plan Review is predicated but, Looking to the Future (January 2021) highlights that:

- “Although there are some policies relating directly to climate change (Core Policies 41 and 42), mitigation and adaptation practices really need to be embedded throughout other policies,”

- “Without a carbon baseline and time-series data on sector emissions, there is a lack of precise understanding about the challenge Wiltshire faces in terms of tackling climate change;” and

- “To measure the effectiveness of the policies there needs to be a new monitoring programme in place.”

Two years before this damaging observation was made, the Council declared a Climate Emergency and committed the county to net zero carbon by 2030. In common with its entire approach to this Local Plan Review, it has failed since 2019 to set annual measurable targets for carbon reduction— targets compatible with achieving net zero by 2030.

Nowhere has the Council detailed how it will increase clean energy generation, or achieve reduced greenhouse gas emissions in the county as a whole. Nor has it attempted to identify stringent near-term targets for emitted and embedded carbon in its development plans, least of all in this draft review of the Local Plan for Chippenham.

Climate change demonstration outside Bristol City Council offices in 2020 [see Climate174 for image]

The Council does not seem to care about this failure to transition to the future green and ultra- low carbon economy. Its failure to identify baseline measures of the county's greenhouse gas emissions seems to be symptomatic of this.

Wiltshire Council seems to be planning to grow Chippenham through a housing led strategy with no regard for the consequences (intended and unintended) of failing to ensure that the growth of the town will not compromise the climate, environment and overall health, wellbeing and security of its citizens in the near and medium-term future.

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

The Local Plan documents point out that “in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030” and that “mitigation is related to dramatically reducing the amount of carbon released in Wiltshire,”

which is “largely related to emissions from cars and the energy used to heat and power homes and businesses.” It is also acknowledged that there is a need to “shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel,” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure.”

There are however two key issues with Wiltshire Council’s approach, namely:

- It fails to properly consider climate change and biodiversity in relation housing numbers and potential locations; and
- It fails to propose a strategy and policies that would deliver what it acknowledges is needed (as cited above).

Firstly, the numbers of houses and their locations will determine more than anything, whether or not the Plan is sustainable and able to deliver the dramatic reductions in carbon emission that are needed. Adding 5,000 more houses to an inflated housing target based on an out of date (2014) multiplier, acknowledged to be an over-estimate of population growth, is particularly detrimental for a rural county like Wiltshire, where employment opportunities are limited and employment growth constrained, and the vast proportion of migrants into the county will need to commute long distances. The excessive numbers are unnecessary and unsupported by evidence, as well as flying in the face of the evidence showing a sharp decline in population growth and the need for prioritising climate and biodiversity protection. They put even greater pressure on Wiltshire Council to find yet more and larger greenfield sites, removing carbon sinks, requiring additional carbon intensive infrastructure and locking in more transport emissions for years to come.

The inflated housing figures also make it harder for Wiltshire Council to meet its 5-year housing land supply (which it is already failing to meet under the current Plan), further undermining Neighbourhood Plans and allowing speculative planning applications to be granted permission, risking adding further emissions through uncontrolled development. They also undermine existing Neighbourhood Plans (e.g., the Bremhill Neighbourhood Plan) and the work local communities have done to protect natural capital and allocate housing away from environmentally valuable areas such as the Avon and Marden valley.

Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield sites and those close to existing infrastructure, closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of “dramatically reducing the amount of carbon released in Wiltshire.” Housing numbers need to be reduced to a point that allows many more people to live near their place of employment, make fewer journeys by car and preserves existing natural capital and carbon sinks. The net result would be fewer roads, fewer bridges and floodplain fly-overs, fewer drainage schemes and flood alleviation measures, shorter grid connections, fewer carbon emissions. More green fields would be

left intact for carbon capture, food production and biodiversity habitats, and there would be substantially less transport emissions, currently the biggest source of greenhouse gas emissions in the county.

After reducing the housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to “shape places to help secure radical cuts in greenhouse gas emissions” through “efficient building design and changes to the way we travel” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure” should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy efficiency standards, with on-building/on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning).

Adopted plans such as the London Plan already have such policies in place and many local planning authorities (LPAs) are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council’s ambitions to achieve net zero development are concerned. In other words, nothing is preventing LPAs from setting net zero development policies. The excuse that viability wouldn’t allow this carries little weight, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage.

Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

In order to further reduce emissions and environmental damage, a sustainable construction policy should also be introduced to ensure embedded emissions, and those resulting from transport and operations during construction are minimised, and high sustainability standards achieved. Both net zero development and sustainable construction policies are already being included in some emerging Neighbourhood Plans, including Chippenham’s, which seem to be further advanced than Wiltshire Council’s Local Plan in this respect.

The papers also acknowledges that the Local Plan should “actively support and help to drive the delivery of renewable and low-carbon energy generation” yet in the Spatial Strategy proposes to lay concrete and tarmac over Wiltshire Council’s (i.e., publicly owned) farms and County farms, wasting a prime opportunity to contribute towards this stated objective. Not only would renewable energy generation actually help the Council and Wiltshire’s residents, cut carbon (as oppose to increasing emissions as currently proposed) but, being a temporary land use, it would preserve valuable carbon sinks, natural capital and high-quality agricultural land, which this Plan has designated for destruction. For example, studies have already been submitted and presented to the Climate Emergency Task Group that demonstrate the viability of ground mounted solar energy generation (solar

farms) on the Wiltshire Council farms to the East and South of Chippenham (destined to be sold to developers under the current version of the proposed Plan).

Finally, the approach to biodiversity is based on a fundamental misunderstanding that natural habitat destruction can be compensated by marginal improvements to nature elsewhere. The question misses the point completely in that successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

In describing biodiversity offsetting and net gain as "licence to trash nature," environmental charity Friends of the Earth point out that nature is declining in the UK, natural ecosystems are under stress and many parts of the UK are becoming biodiversity deserts. Their view is that biodiversity net gain should be a last resort, used only when every avenue to avoid environmental harm has been exhausted. Their view is supported by a 2014 Australian Senate enquiry into offsetting in which it was reported that after a decade of offsetting there was no evidence that it has worked in practice and there were studies actually showed the opposite. In 2017 a review of 10 years of offsetting in New South Wales found that it would take over 140 years for the promised net gain in nature to be provided.

As Friends of the Earth point out, there is no substitute for proper nature conservation, which is proven to work and to be good value for money. Scientific evidence demonstrates that it is not feasible in most circumstances to destroy biodiversity in one area and reinstate in another. Whilst there is an urgent need to improve protection of nature and biodiversity in the planning system, we cannot expect market-based offsetting and biodiversity net gain to achieve it.

In terms of habitat destruction and biodiversity loss, no material consideration seems to have been given to the natural capital/biodiversity impacts of developing sites 1 and 2, and there is only one question that refers to this in the Climate Change and Biodiversity Net Gain section. Questions asked of Wiltshire Council officers in the consultation webinars and at the Chippenham Area Board indicate that these impacts have not been considered in any depth and that this would be done at a later stage (by which time it will be harder to take account of what's discovered, properly consider alternatives and progress the kind of radically different Plan that is needed). Given the unique nature of the Avon and Maren valley and the loss of valuable habitats and biodiversity that would occur if these proposals were to go ahead, we have added our comments on habitat destruction and biodiversity loss under question B2.

Woodland east of Chippenham [see Climate174 for image]

Rep ID: Climate175

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Pegasus Group

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Barratt Homes (Bristol)

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate175

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?

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

A3: How should these actions be delivered and measured?

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

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management^{3.5}We generally support the measures that have been set out in this section. National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding. ^{3.6}This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for development, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.^{3.7}There should not, however, be a distinction between a site entirely within Flood Zone 1 and a site which may fall within multiple Flood Zones, assuming that development would be confined to areas at the lowest risk of flooding.

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?

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity^{3.8}Again, we support the provision of high-quality Green and Blue Infrastructure (GBI) within new development. We would suggest that any formal policies are aligned with the provisions of the upcoming Environment Bill which will likely become law before the plan's adoption (predicted 2022). This includes any guidance on how this should be measured.

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?

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

3.9 We support the ambition to deliver net zero carbon standards for development assuming that this is subject to a robust viability assessment. Any policies which seek to achieve this will need to be mindful of the proposed changes to national planning policy and forthcoming regulatory changes which will have an impact on their scope. These changes relate to zero carbon ready homes, as well as biodiversity net gain (see above), broadband provision, and electric vehicle charging.

3.10 Forthcoming legislation is expected on all of these elements following consultations undertaken over the last few years. This is based upon the Government’s intention of creating a standardised national approach on these elements through changes to the building regulations and other wider legislative changes to ensure that the imposition of varied local standards does not undermine the delivery of housing in the short/medium term.

3.11 Whatever policy does come forward, it will need to make sure that any terminology is clearly defined as terms like 'zero carbon' and 'carbon neutral' mean different things to different people.

3.12 Furthermore, any policy will need to be explicit in establishing a clear threshold for developers and decision takers so there is no ambiguity around what standards need to be achieved. It will need to be clear to both applicants and decision takers when the terms of the policy have and have not been met to avoid unnecessary debate at the planning application stage.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Policy Theme 4 - Sustainable Energy Generation and Management^{3.13} Again, the ambition of this policy theme is support; however, there needs to be an acknowledgement that there are inherent maintenance and operation liabilities can make the delivery of this difficult on sites.^{3.14} Again, a clear dividing line needs to be established so that it is clear to applicants and decision takers what needs to be delivered and what would be unacceptable. This should be informed through an appropriate viability assessment and be mindful of any policy or regulatory developments at a national level.

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

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?

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?

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?

Policy Theme 5 - Sustainable Transport and Air Quality^{3.15}Policies requiring the provision of EV charging points would be supported on the basis that electric vehicles have, operationally at least, lower emissions which will benefit Air Quality as well as reduce impacts on climate change. However, the advent of electric vehicles and increased levels of homeworking are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.^{3.16}We note that the Council remains committed to improving the self-containment of Wiltshire's settlements as the best solution to de-carbonising transport. This is something that we support but are not convinced it will effectively be addressed by the proposed emerging strategy (as set out above). ^{3.17}Improving self-containment is essential to reducing levels of out-commuting and, as we have highlighted above, this is a factor which could justify greater levels of development. We note that the April 2019 Cabinet paper suggested that there was a lack of demand for employment land within the district. However, this should not be interpreted as an indication that these towns are inappropriate development locations. Indeed, the WCS is clear in recognising the that the county's Market Towns have "potential for significant development that will increase the jobs and homes in each town in order to help sustain... services and facilities and promote better levels of self-containment and viable sustainable communities."^{43.18}It is the constrained level of housing growth in recent years that has failed to deliver the critical mass required to attract the supporting jobs, infrastructure and services to boost levels of self-containment to reduce out-commuting and encourage more sustainable patterns of travel.^{3.19}The best way to encourage sustainable transport patterns is to direct development of a sufficient scale at appropriate locations to support the delivery of jobs, infrastructure and services to reduce the need for out-commuting. ^{3.20}This is why the approach to Warminster needs to be reviewed as there may be an argument to increase levels of growth here in the interests of improving self-containment. Persisting with the Core Strategy's approach, which has had an adverse impact on self-containment, is not the obvious approach that should be pursued.

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?

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?

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?

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

ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN^{3.1}Wiltshire Council declared a climate emergency in February 2019. We support the Local Plan in its efforts to achieve carbon neutrality by 2030. The Local Plan will not be entirely responsible for securing this but will have a significant role to play in minimising impacts from various sources of carbon emissions (transport, construction etc). This will largely be done through ensuring development is steered toward the most sustainable locations; however, there may also be scope to introduce new development management policies to secure, for example, higher standards of energy efficiency in new homes.^{3.2}As we have noted above, the Council cannot simply blindly look to roll forward the current Core Strategy distribution when it has clearly been deficient in a number of ways, particularly in improving the self -containment of settlements and reducing out-commuting to places like Bristol, Bath and Swindon. ^{3.3}There needs to be a greater consideration of what the implications of simply rolling forward the Core Strategy will be for settlements like Warminster. As we have set out above, the evidence suggests that additional housing growth is essential for creating the critical

mass required to deliver jobs, infrastructure and services which will ultimately improve self-containment. However, no assessment of whether the WWUE will deliver this has been undertaken. This raises concerns about the Local Plan Review's ability to address the issue of growth and climate change effectively. 3.4 Below, we provide some comments on the five themes identified in the Addressing Climate Change and Biodiversity Topic Paper.

Rep ID: Climate176

Consultee code: Landowner

Consultee Organisation (if applicable): Ridge and Partners LLP

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): The Badminton Estate

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate176

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

CLIMATE CHANGE THROUGH THE LOCAL PLAN

5.1. It is encouraging to see the Council have dedicated a detailed document to “Addressing Climate Change and biodiversity net gain through the local plan”. It is our view that the Local Plan, in connection with other plans, for example the Local Transport Plan and the emerging Climate Strategy, can support sustainable development and greatly influence the way places change and grow.

5.2. It is of note that the UK Met Office predicts hotter, drier summers and milder, wetter winters in Wiltshire along with an increase in the magnitude and frequency of extreme weather events such as heatwaves, floods and droughts. This could have far reaching social, environmental and economic impacts and will require appropriate adaptation and mitigation measures.

5.3. In particular, it is our view that plan making’s role in addressing climate change can help influence the way we live, work and travel. The local plan has the opportunity to shape places to help secure radical cuts in greenhouse gas emissions (for example through efficient building design and changes to the way we travel). The NPPF states that “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”.

5.4. In responding to “Consultation Question A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?”, it is our view that there is a need to ensure the distribution of new development delivers greater levels of self-containment and reduces the need for unsustainable travel patterns with a particular emphasis in increasing the sustainability of settlements within the rural area. Ensuring proportionate and incremental growth is directed to these areas will reduce the need for those to travel within the District and beyond such as toward Swindon, Bath and Bristol to access services, facilities and employment opportunities. The Council recognises the high amount of out-commuting travel within the District as set out within their adopted Core Strategy and the emerging Local Plan.

5.5. Further, through the implications of Covid-19, as mentioned above, it is recognised that people will be changing the way in which they work, live and play, with high intentions for those who are working from home to continue to do so. With this comes a reliance for more sustainable growth to be directed toward Smaller Villages to reduce the reliance of out commuting that is otherwise having a negative impact upon climate change through rate of carbon emissions. The emerging Local Plan has an important role to play in responding to the current and future trends of society, that would subsequently help the Council fight the impacts of climate change, by allowing for a proportionate and sustainable amount of growth to be directed toward Smaller Villages within the District.

5.6. We therefore respectfully request for the above to be looked upon favourably by the Council as their emerging local plan gathers momentum.

Rep ID: Climate177

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Pegasus group

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Wainhomes (Severn Valley)

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate177

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?

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

A3: How should these actions be delivered and measured?

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

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management 3.5 We generally support the measures that have been set out in this section. National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding. 3.6 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for development, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development. 3.7 There should not, however, be a distinction between a site entirely within Flood Zone 1 and a site which may fall within multiple Flood Zones, assuming that development would be confined to areas at the lowest risk of flooding.

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?

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity 3.8 Again, we support the provision of high-quality Green and Blue Infrastructure (GBI) within new development. We would suggest that any formal policies are aligned with the provisions of the upcoming Environment Bill which will likely become law before the plan's adoption (predicted 2022). This includes any guidance on how this should be measured.

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?

Policy Theme 3 – Sustainable Design and Construction in the Built Environment 3.9We support the ambition to deliver net zero carbon standards for development assuming that this is subject to a robust viability assessment. Any policies which seek to achieve this will need to be mindful of the proposed changes to national planning policy and forthcoming regulatory changes which will have an impact on their scope. These changes relate to zero carbon ready homes, as well as biodiversity net gain (see above), broadband provision, and electric vehicle charging. 3.10Forthcoming legislation is expected on all of these elements following consultations undertaken over the last few years. This is based upon the Government’s intention of creating a standardised national approach on these elements through changes to the building regulations and other wider legislative changes to ensure that the imposition of varied local standards does not undermine the delivery of housing in the short/medium term. 3.11Whatever policy does come forward, it will need to make sure that any terminology is clearly defined as terms like 'zero carbon' and 'carbon neutral' mean different things to different people. 3.12Furthermore, any policy will need to be explicit in establishing a clear threshold for developers and decision takers so there is no ambiguity around what standards need to be achieved. It will need to be clear to both applicants and decision takers when the terms of the policy have and have not been met to avoid unnecessary debate at the planning application stage.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Policy Theme 4 - Sustainable Energy Generation and Management 3.13 Again, the ambition of this policy theme is supported; however, there needs to be an acknowledgement that there are inherent maintenance and operation liabilities can make the delivery of this difficult on sites. 3.14 Again, a clear dividing line needs to be established so that it is clear to applicants and decision takers what needs to be delivered and what would be unacceptable. This should be informed through an appropriate viability assessment and be mindful of any policy or regulatory developments at a national level.

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

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?

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?

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?

Policy Theme 5 - Sustainable Transport and Air Quality 3.15 Policies requiring the provision of EV charging points would be supported on the basis that electric vehicles have, operationally at least, lower emissions which will benefit Air Quality as well as reduce impacts on climate change. However, the advent of electric vehicles and increased levels of homeworking are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means. 3.16 We note that the Council remains committed to improving the self-containment of Wiltshire's settlements as the best solution to de-carbonising transport. This is something that we support but are not convinced it will effectively be addressed by the proposed emerging strategy (as set out above). 3.17 Improving self-containment is essential to reducing levels of out-commuting and, as we have highlighted above, this is a factor which could justify greater levels of development. We note that the April 2019 Cabinet paper suggested that there was a lack of demand for employment land within the district. However, this should not be interpreted as an indication that these towns are inappropriate development locations. Indeed, the WCS is clear in recognising the that the county's Market Towns have "potential for significant development that will increase the jobs and homes in each town in order to help sustain... services and facilities and promote better levels of self-containment and viable sustainable communities."43.18 It is the constrained level of housing growth in recent years that has failed to deliver the critical mass required to attract the supporting jobs, infrastructure and services to boost levels of self-containment to reduce out-commuting and encourage more sustainable patterns of travel. 3.19 The best way to encourage sustainable transport patterns is to direct development of a sufficient scale at appropriate locations to support the delivery of jobs, infrastructure and services to reduce the need for out-commuting. This is why the approach at Royal Wootton Bassett is supported as this is based on an understanding that higher levels of growth are necessary to improve self-containment and sustainability.

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?

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?

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?

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

ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN 3.1 Wiltshire Council declared a climate emergency in February 2019 and we support the Local Plan in its efforts to achieve carbon neutrality by 2030. The Local Plan will not be entirely responsible for securing this but will have a significant role to play in minimising impacts from various sources of carbon emissions (transport, construction etc). This will largely be done through ensuring development is steered toward the most sustainable locations; however, there may also be scope to introduce new development management policies to secure, for example, higher standards of energy efficiency in new homes in line with emerging Government legislation on this issue (see 3.9-3.12 below). 3.2As we have noted above, the Council cannot simply blindly look to roll forward the current Core Strategy distribution when it has clearly been deficient in a number of ways, particularly in improving the self-containment of settlements and reducing out-commuting to places like Bristol, Bath and Swindon. 3.3As we have noted elsewhere, the approach to Royal Wootton Bassett is supported on the basis that there has been a recognition that higher levels of growth are necessary to make transport connectivity with Swindon more sustainable whilst improving levels of self-

containment. 3.4 Below, we provide some comments on the five themes identified in the Addressing Climate Change and Biodiversity Topic Paper.

Rep ID: Climate178

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Pegasus

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Barratt Homes and David Wilson Homes

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate178

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?

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

A3: How should these actions be delivered and measured?

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

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management

3.3 We generally support the measures that have been set out in this section. National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.

3.4 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for development, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.

3.5 There should not, however, be a distinction between a site entirely within Flood Zone 1 and a site which may fall within multiple Flood Zones, assuming that development would be confined to areas at the lowest risk of flooding.

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?

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity

3.6 Again, we support the provision of high-quality Green and Blue Infrastructure (GBI) within new development. We would suggest that any formal policies are aligned with the provisions of the upcoming Environment Bill which will likely become law before the plan's adoption (predicted 2022). This includes any guidance on how this should be measured.

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?

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

3.7 We support the ambition to deliver net zero carbon standards for development assuming that this is subject to a robust viability assessment. Any policies which seek to achieve this will need to be mindful of the proposed changes to national planning policy and forthcoming regulatory changes which will have an impact on their scope. These changes relate to zero carbon ready homes, as well as biodiversity net gain (see above), broadband provision, and electric vehicle charging.

3.8 Forthcoming legislation is expected on all of these elements following consultations undertaken over the last few years. This is based upon the Government’s intention of creating a standardised national approach on these elements through changes to the building regulations and other wider legislative changes to ensure that the imposition of varied local standards does not undermine the delivery of housing in the short/medium term.

3.9 Whatever policy does come forward, it will need to make sure that any terminology is clearly defined as terms like 'zero carbon' and 'carbon neutral' mean different things to different people.

3.10 Furthermore, any policy will need to be explicit in establishing a clear threshold for developers and decision takers so there is no ambiguity around what standards need to be achieved. It will need to be clear to both applicants and decision takers when the terms of the policy have and have not been met to avoid unnecessary debate at the planning application stage.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

Policy Theme 4 - Sustainable Energy Generation and Management

3.11. Again, the ambition of this policy theme is support; however, there needs to be an acknowledgement that there are inherent maintenance and operation liabilities can make the delivery of this difficult on sites.

3.12. Again, a clear dividing line needs to be established so that it is clear to applicants and decision takers what needs to be delivered and what would be unacceptable.

This should be informed through an appropriate viability assessment and be mindful of any policy or regulatory developments at a national level.

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

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?

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?

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?

Policy Theme 5 - Sustainable Transport and Air Quality

3.13. Policies requiring the provision of EV charging points would be supported on the basis that electric vehicles have, operationally at least, lower emissions which will benefit Air Quality as well as reduce impacts on climate change. However, the advent of electric vehicles and increased levels of homeworking are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.

3.14. We note that the Council remains committed to improving the self-containment of Wiltshire's settlements as the best solution to de-carbonising transport. This is something that we support but are not convinced it will effectively be addressed by the proposed emerging strategy (as set out above).

3.15. Improving self-containment is essential to reducing levels of out-commuting and, as we have highlighted above, this is a factor which could justify greater levels of development. We note that the April 2019 Cabinet paper suggested that there was a lack of demand for employment land within the district. However, this should not be interpreted as an indication that these towns are inappropriate development locations. Indeed, the WCS is clear in recognising the that the county's Market Towns have "potential for significant development that will increase the jobs and homes in each town in order to help sustain... services and facilities and promote better levels of self-containment and viable sustainable communities."4

3.16. It is the constrained level of housing growth in recent years that has failed to deliver the critical mass required to attract the supporting jobs, infrastructure and services to boost levels of self-containment to reduce out-commuting and encourage more sustainable patterns of travel.

3.17. The best way to encourage sustainable transport patterns is to direct development of a sufficient scale at appropriate locations to support the delivery of jobs, infrastructure and services to reduce the need for out-commuting.

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?

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?

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?

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

3. ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

3.1. Wiltshire Council declared a climate emergency in February 2019. We support the Local Plan in its efforts to achieve carbon neutrality by 2030. The Local Plan will not be entirely responsible for securing this but will have a significant role to play in minimising impacts from various sources of carbon emissions (transport, construction etc). This will largely be done through ensuring development is steered toward the most sustainable locations; however, there may also be scope to introduce new development management policies to secure, for example, higher standards of energy efficiency in new homes.

3.2. Below, we provide some comments on the five themes identified in the Addressing Climate Change and Biodiversity Topic Paper.

Rep ID: Climate179	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Lichfields
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): L&Q Estates	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: Climate179
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?	
A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?	
A3: How should these actions be delivered and measured?	

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

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?

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity 4.1 This theme is broadly supported and it is commented that L&Q's site to the east of Swindon Road in Royal Wootton Bassett provides opportunity to significantly enhance and create a new Green and Blue Infrastructure asset (to be known as Coped Hall Woodland Park) which will also provide significant opportunity for recreation with circa 3km of walking routes proposed. Due to the previous intensive farm use of this site, there is significant opportunity for biodiversity net gain potentially above the required 10%. 4.2 That said, the Council proposes that all new development will provide a minimum of 10% net biodiversity gain on site, or off-site in accordance with measures to be set out in policy and the emerging GBI Strategy. As raised by the HBF, L&Q Estates is also of the view that the Council's policy approach to biodiversity should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduces the risks of unexpected costs and delays. 4.3 The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRS will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. Each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State. This will achieve the best combination of

local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.

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?

Policy Theme 3 – Sustainable Design 4.4The document rightly acknowledges the ‘climate emergency’ and it is appropriate that that this issue must be addressed in the forthcoming plan. It is a key issue permeating every part of the plan from the spatial strategy to building design and infrastructure. 4.5That said, the document refers to more stringent building standards with reference to net zero carbon development by 2030. Whilst no detail is provided, it is considered that building requirements in Wiltshire should be reflective of Government requirements and should not seek to run ahead of these. Whilst greater levels of sustainable construction are supported in principle, in the context of the significant housing requirement, this cannot be to the detriment of delivery, particularly that of affordable housing. It is therefore considered that viability must be at the heart of any decisions which could significantly increase build cost. 4.6The Council should rely on proposed changes to the Building Regulations.The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council is referred to the Government’s proposed changes to Parts L (Conservation of Fuel & Power), F (Ventilation), M (Access to & Use of Buildings), R (Physical Infrastructure for High-Speed Electronic Communications Networks) & S (Electric Vehicle Charging in Residential & Non-residential Buildings) of the Building Regulations and the Government’s proposals for biodiversity gain set out in the Environment Bill. As set out in the Planning for the Future White Paper a simpler planning process improves certainty.

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

Policy Theme 5 – Sustainable Transport 4.7The document highlights the importance of sustainable development and it is agreed that development that comes forward must be sustainably located. This means locating new development where people are capable of meeting their day to day needs without the use of the private car. In this regard, it is considered that L&Q’s site at Swindon Road in Royal Wootton Bassett is considered the most appropriate site in the town for meeting this objective. 4.8As set out in Appendices 1 and 3, in terms of the assignment of traffic from site locations, those sites located to the north of Royal Wootton Bassett would put the least proportion of traffic through the town centre whereas the sites located to the south and west will inevitably put the most strain on the town centre. 4.9Sites located to the north of the town also provide the greatest opportunity for sustainable travel. L&Q’s site is within easy walking distance of a number of services and facilities including education, health, retail, employment, leisure, bus services, the town centre and the Sustrans strategic cycle route providing access to Windmill Hill Business Park and Swindon. Development of this site should be supported as it provides an excellent opportunity to locate growth sustainability in close proximity to local facilities and capable of responding to the local community’s priorities of future growth.

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?

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?

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?

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

Rep ID: Climate180

Consultee code: Neighbouring Authority

Consultee Organisation (if applicable): South Somerset District Council

Is this response on behalf of someone else/another organisation?

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
Climate180

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?

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

A3: How should these actions be delivered and measured?

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

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?

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?

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?

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

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?

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

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?

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?

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?

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?

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?

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?

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

Climate Change The steps being taken by Wiltshire Council to address Climate Change and Net Biodiversity are welcomed. South Somerset District Council is seeking to be carbon neutral across its own operations by 2030 at the latest and ideally by 2023. It will also be working to achieve a significant reduction in emissions and improve carbon offset rates across the geography of South Somerset via direct action, supporting our communities in their ambitions and ensuring that working towards carbon neutrality is a thread that runs through all our decision-making. More information can be found in our Environment Strategy here.

Natural Environment We would like to take this opportunity to draw to your attention the fact that in August the Council received a letter from Natural England stating that phosphates levels within the Somerset Levels catchment had rendered the protected sites on the Levels and Moors to be in an unsatisfactory condition. As a result, Natural England indicated that the scope for the local planning authority to grant planning permission for further developments. The developments caught by this situation are:

- New residential units –including tourist accommodation, gypsy sites /pitches
- Agricultural Development –additional barns, slurry stores etc. where it is likely to lead to an increase in herd size
- Prior Notifications of agricultural development where, as a result of the development, the herd size may increase. Also, prior notifications for change of use of office to dwellings and agricultural buildings to dwellings
- Anaerobic Digesters
- Possibly some tourism attractions

We have a map that identifies a catchment area of affected land which extends just into Wiltshire. You can find more information and a link to the map here. It is important to note that the map is only indicative at this stage, and that the Somerset Nutrient Strategy will address a more definitive catchment map to ensure greater certainty for developers/applicants.