

Appendix 4

Wiltshire Local Plan Review

**Addressing climate change and
biodiversity net gain through the Local
Plan - raising the ambition**

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Executive Summary

Climate change and its effect on the World around us is widely considered as one of the biggest global issues we face today. Additionally, this year the World has been faced with enormous challenges associated with COVID-19, which has dramatically changed the way we live our lives. The response to COVID-19 has demonstrated the resilience of communities and the ability to take urgent action when needed.

In February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030. Despite the difficulties faced this year, it is important not to lose sight of plans to tackle the ongoing threat of climate change. Indeed, the Council is currently preparing a number of strategies aimed at delivering synergistic step-changes towards tackling climate change. The review of the Wiltshire Core Strategy provides a real opportunity to introduce land-use policies to guide forecast growth in a manner that delivers sustainable development designed to tackle and adapt to and mitigate the effects of our changing climate.

The challenge Wiltshire faces can be viewed in terms of both mitigating and adapting to climate change. Mitigation is related to dramatically reducing the amount of carbon released in Wiltshire. This is largely related to emissions from cars and the energy used to heat and power homes and businesses. Adaptation is associated with becoming more resilient against the impacts of climate change, allowing people to live their lives without being negatively affected by events such as flooding and heatwaves. Allied to these important themes is the need to reverse the growing ecological crisis through a programme of measures that include biodiversity net gain and placing green spaces at the heart of sustainable place shaping.

This paper outlines the challenge of climate change in a national and local context and describes how the preparation of the Wiltshire Local Plan can, in part, help address the issue. Following this, the paper reviews our existing planning policies to determine whether the current Wiltshire Core Strategy delivers enough to tackle climate change over the period up to 2026 and beyond. As climate change is such a complex and far reaching issue, five integrated policy themes have been identified to take forward for further scrutiny and development. Finally, consultation questions are posed to support the formulation of new planning policy, including the level of ambition consultees believe is achievable, viable and desired.

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. However, it is important to note that land-use planning alone cannot tackle climate change. It will take a combined effort from every individual, organisation and business across Wiltshire and beyond. There will also need to be a national effort with a change in behaviour and consumption habits, and nationwide policies to drive major changes, set by central Government.

Following this consultation, further work will be conducted on forming a more detailed policy response to climate change. Information gathered through the consultation will be of great value. It will help to shape how ambitious the Local Plan should be and will inform what is possible from a land-use planning perspective.

1. Setting the Scene

Defining 'Climate Change'

- 1.1 Robust scientific evidence suggests that the Earth's climate is changing due to an unnatural increase in greenhouse gasses (GHG) in the atmosphere since the industrial revolution. Through burning fossil fuels and changing land use, human activity has quickly become the leading cause of climate change.
- 1.2 Global temperature has increased by approximately 1°C since the late 19th Century. Most of the warming has been in more recent decades. The five warmest years on record have been since 2010¹. This rise in temperature is driving changes in the earth system which is leading to impacts such as changing weather patterns and rising sea levels.
- 1.3 As the Earth warms, it triggers other processes on the surface, oceans and atmosphere known as climate feedbacks. Positive feedbacks strengthen the warming further, whilst negative feedbacks weaken it. These processes can lead to tipping points, which are abrupt and irreversible changes in the Earth system. The threat of these tipping points must compel political and economic action on emissions².

A Global issue

- 1.4 The Intergovernmental Panel on Climate Change (IPCC)³ is the United Nations body for assessing the science related to climate change. Set up in 1988, the objective of the IPCC is to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC prepares comprehensive Assessment Reports about the knowledge of climate change, impacts and risks and options for reducing the rate at which climate change is happening. These reports are a key input into international climate change negotiations.
- 1.5 The United Nations Framework Convention on Climate Change (UNFCCC) has near universal membership and aims to prevent dangerous human interference with the climate system⁴. In 2005 the Kyoto Protocol⁵ committed parties to take action on their greenhouse gas emissions. It was legally binding and was aimed at reducing emissions to below that of 1990 levels. Different countries had different targets, with the main consensus being more of the burden was put upon industrialised countries. The success of the Kyoto Protocol has been contentious as although the 36 countries which ratified the agreement did succeed in the first commitment period (2008-2012), global emissions still rose.

¹ <https://climate.nasa.gov/evidence/>

² <https://www.nature.com/articles/d41586-019-03595-0#ref-CR1>

³ <https://www.ipcc.ch/>

⁴ <https://unfccc.int/>

⁵ <https://unfccc.int/process-and-meetings/the-kyoto-protocol/what-is-the-kyoto-protocol/kyoto-protocol-targets-for-the-first-commitment-period>

- 1.6 The second commitment period runs until 2020. In 2016 the Paris Agreement⁶ for the first time brought all nations into a common cause to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5°C. However, the Paris Agreement is not legally binding and as of November 2020, doesn't include the United States of America. Nevertheless, the UK ratified both the Kyoto Protocol and Paris Agreement and is therefore committed to adhering to these International targets.
- 1.7 Nationally, the Climate Change Act⁷ commits the UK to reach carbon neutrality by 2050. Councils are taking action to reduce their own carbon emissions and working with partners and local communities to tackle the impact of climate change on their local area. Indeed, Wiltshire Council, along with numerous local authorities have set more far reaching ambitions through their respective climate emergency declarations. Wiltshire Council has committed to becoming net carbon neutral by 2030 and is seeking to make the County carbon neutral by 2030. Achieving this will be challenging, but the new Local Plan will have a role to play.

2. What is the basis for the climate challenge and where are we currently?

Review of legislation and national policy

2.1 International

- Kyoto Protocol - an international agreement that aimed to reduce carbon dioxide (CO₂) emissions and the presence of greenhouse gases (GHG) in the atmosphere.
- Paris Agreement - central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5°C.

2.2 National

- National Planning Policy Framework (NPPF)/National Planning Practice Guidance (PPG) - sets out the key national planning priorities for England. When read together, these documents represent a material consideration in plan-making and development management decisions. The 2019 revised NPPF retains the key link between planning policy and the provisions of the Climate Change Act 2008.

⁶ <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

⁷ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

- Climate Change Act 2008 - introduced a statutory target of reducing carbon dioxide emissions to at least 100% below 1990 levels by 2050, with interim targets, set through five-yearly carbon budgets.
- Planning and Compulsory Purchase Act 2004 – section 19(1A) requires local planning authorities to include in their Local Plans ‘**policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation, and adaption to, climate change**’.⁸
- Environment Bill 2019-2021 – although not yet part of UK legislature makes provision for targets, plans and policies for improving the natural environment.
- White Paper: Planning for the Future 2020 – a package of proposals to reform the planning system in England to streamline and modernise the planning process. Proposals 15, 17 and 18 are of relevance.

What is the challenge?

- 2.3 In Wiltshire, long-term meteorological predictions⁹ indicate hotter, drier summers and milder, wetter winters are expected. There will also likely be 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 adaption and mitigation measures. According to the IPCC, adaption is an 'adjustment in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderates harm or exploits beneficial opportunities' whilst mitigation is an intervention to reduce the emissions sources or enhance the sinks of greenhouse gases.

Declaration of a climate emergency in Wiltshire

- 2.4 In February 2019 Wiltshire Council declared a climate emergency and resolved to seek to make the county carbon neutral by 2030¹⁰. The term carbon neutral means to result in no net release of Carbon Dioxide into the atmosphere and should take into account schemes offset carbon production. This will likely 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. There will need to be dramatic societal and economic shifts, which will be bought about by new or updated national legislation and policy which will guide and provide the evidence for these changes.
- 2.5 The challenge for the Council is both to plan for the effects of climate change alongside working towards achieving the net carbon ambition by 2030. Part of the answer to this is ensuring the Local Plan has robust, forward thinking policies in place which enable new development to adapt to and mitigate the effects of climate change. The Council’s Environment Select Committee established a Global Warming

⁸ [Section 182 of the Planning Act 2008](#) amended [section 19 of the Planning and Compulsory Purchase Act 2004](#)

⁹ Met Office UK

¹⁰ <http://www.wiltshire.gov.uk/green-economy-climate-emergency>

and Climate Emergency Scrutiny Task Group to make recommendations about how the Council may address this challenge for both plan making and more widely.

3. The role of land-use plans in tackling climate change

Local land use planning and climate change

- 3.1 It is considered that now is an important moment 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. The key objectives of the Climate Change Act, alongside local commitments to reach carbon neutrality are reflected in recently published Government proposals for reforming the planning system. As such, the legal and national planning policy frameworks will be key influencers of the form and content of policies within all Local Plans.
- 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.’¹¹
- 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).
 - Ensure that there are real opportunities to take positive action on climate change by encouraging community-led initiatives such as the promotion of decentralised renewable energy use or securing land for local food sourcing.
 - Increase sustainable transport use and local transport solutions.’¹²
- 3.4 There are of course limitations on how far land-use planning policies can go in terms of addressing climate change. Indeed, the greatest challenge lies in tackling the carbon footprint of the existing built environment as that will involve significant investment in adapting housing and businesses. In planning for the period up to 2036, the Council, through its Local Plan will need to meet legislative and national

¹¹ <https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>

¹² <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=fd66dbe5-2b88-4acf-b927-256a82db9abe>

policy requirements. More houses, employment facilities, schools and critical infrastructure will need to be built to support the population of Wiltshire. The Council will have to ensure that the right policies are in place to facilitate this development whilst ensuring that the challenges presented by climate change and ecological decline are sustainably addressed.

Local political engagement

- 3.5 To inform the review of the Local Plan discussion has taken place with a climate change local plan focus group. This included representatives from both Cabinet and the Global Warming and Climate Emergency Scrutiny Task Group set up by Wiltshire Council's Environment Select Committee. During a focus group session, members were asked to express thoughts about how the issue of climate change could be tackled, and specifically the themes that could be explored in the Local Plan Review. Feedback from the focus group was themed around four key topics. The main points are summarised below.
- 3.6 Built environment
- Ensuring the construction and design of new building is sustainable and exploring routes to tackling the retrofitting of existing build stock
 - Making transport greener through improvements to infrastructure and investment in sustainable modes of transport
 - Introducing more renewable energy to support sustainable patterns of development and work with energy providers to deliver a transition from carbon-based homes and businesses
- 3.7 Natural Environment
- Protecting the natural environment, ecology and ecosystem services
 - Tackling and adapting to changing weather patterns and its impacts - particularly flooding and summer heating
 - Using land more effectively, principally a coordinated programme of afforestation and carbon capture
- 3.8 Both
- Building sustainable communities including – delivering energy efficient housing, sustainable transport options and improved infrastructure within communities to prevent the need to travel to access employment, services and facilities
 - Making sure homes and businesses are adaptable and resilient to impacts such as summer heating and flood risk
 - Working with energy companies, the development industry and local communities to target improvements in energy generation and resilience
- 3.9 People
- There needs to be greater engagement at a local level to raise the game in terms of tackling climate change
 - Policies governing the delivery of growth across Wiltshire need to change to ensure that new development is truly sustainable and resilient to the effects of climate change

- 3.10 Due to effects of COVID-19, the focus group has only met once. However, Global Warming and Climate Emergency Scrutiny Task Group has met regularly and a series of recommendations to Cabinet will be tabled once current COVID-19 restrictions are lifted. It is intended that the Task Group's recommendations in respect of land-use planning will be taken into consideration once published in due course. The draft recommendations can be viewed via this LINK.
- 3.11 The themes within the draft recommendations closely align with the themes developed following the review of the existing policies of the Wiltshire Core Strategy.

Learning from best practice

- 3.12 In order to tackle the complex issues that climate change presents, adaption and mitigation strategies must be woven into a number of planning policy areas and thereby serve as a form of 'golden thread' through the emerging Local Plan. Indeed, where possible, opportunities should be sought to use land-use planning policies to help align wider plans and programmes – e.g. the emerging Local Transport Plan.
- 3.13 The Town and Country Planning Association and Royal Town Planning Institute provides a guide¹³ which includes a section on local planning approaches to tackling climate change. This includes guidance and a comprehensive package of measures which create a pathway from setting objectives to evidence gathering and specific mitigation and adaption policies. It is clear from a review of recently adopted and emerging Local Plans that there are already a range of sound strategies for tackling climate change and biodiversity enhancement which could be adapted to help guide the preparation of land-use policies for Wiltshire. Indeed, through the current duty to cooperate network, the preparation of the Local Plan provides an opportunity to learn from and help influence policies of neighbouring local planning authorities, as well gather evidence to support measures to decarbonise new development at a strategic scale.

Establishing a carbon baseline and budget for Wiltshire

- 3.14 The first step in seeking to achieve Wiltshire Council's goal in reaching net carbon neutrality by 2030 is to identify a carbon baseline, and then to set a carbon budget, over a number of years to reduce the amount of carbon emitted across a range of sectors.
- 3.15 There are a number of ways in which other local authorities have identified a carbon baseline and set carbon budgets. One of the most popular methods employed to date has been through the use of the Government backed SCATTER tool.

¹³ <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=fd66dbe5-2b88-4acf-b927-256a82db9abe>

SCATTER

3.16 SCATTER stands for Setting City Area Targets and Trajectories for Emissions Reduction. It is a local authority emission capturing tool, built to help understand carbon emissions at a local authority scale, or urban area level. It has been developed to help create 'low-carbon local authorities'¹⁴. SCATTER provides the opportunity to standardise greenhouse gas reporting and align with international frameworks, such as setting targets in line with the Paris Agreement.

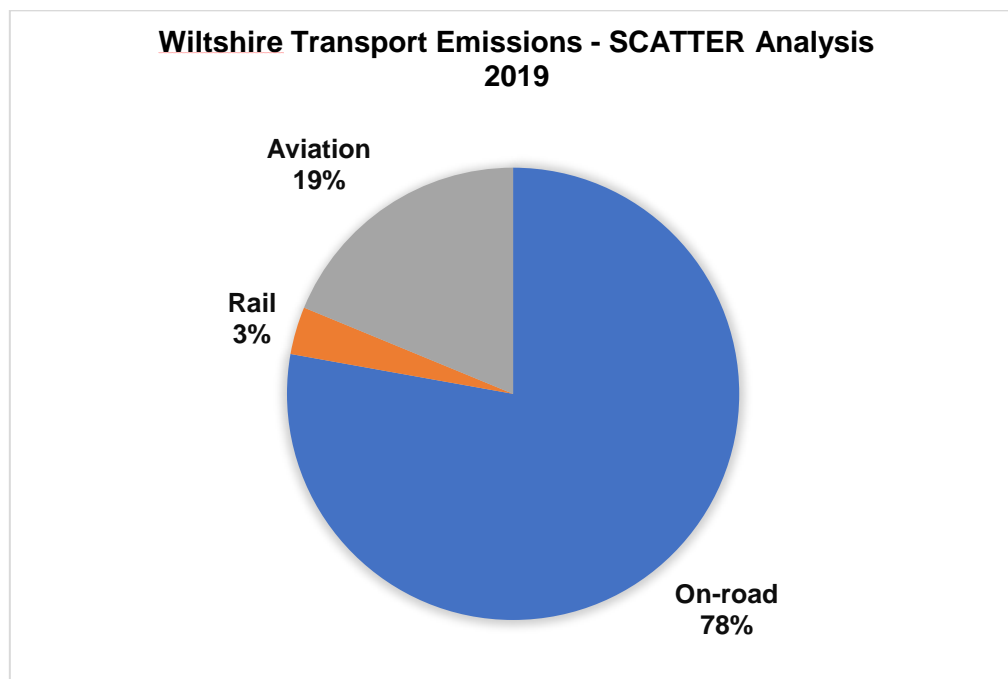
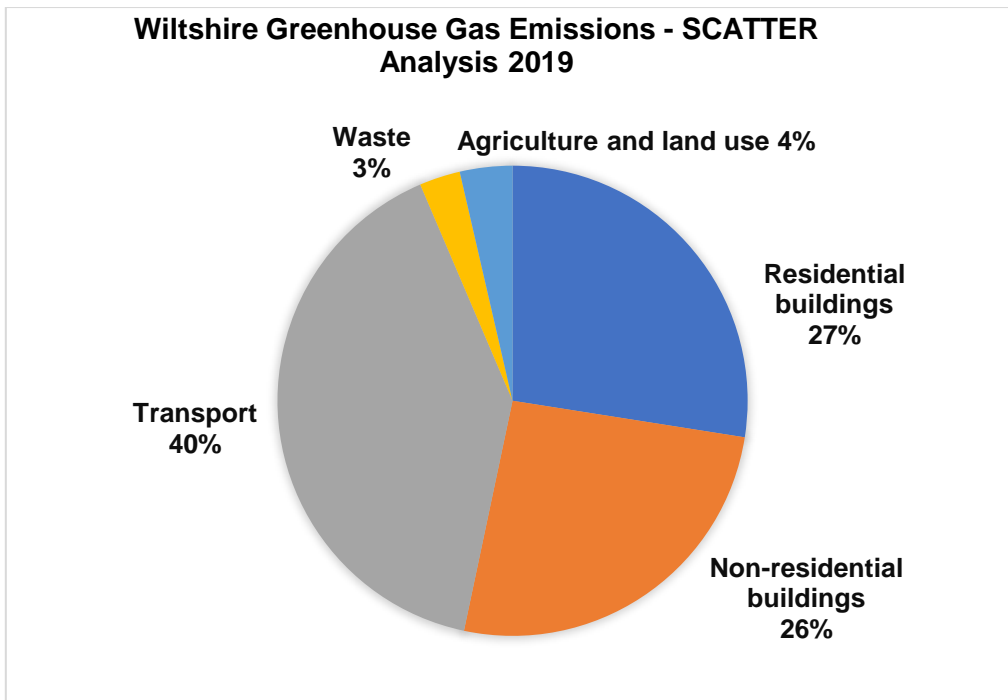
The SCATTER tool:

- Generates a greenhouse gas emissions inventory following the Global Protocol for City-wide Greenhouse Gas emissions for a local authority area
- Helps the understanding and development of a credible decarbonisation pathway in line with emissions reduction targets
- Provides outputs that can be used for engagement to create a collaborative carbon reduction approach for Local Authorities

3.17 It is important to note that SCATTER uses location-based production emissions rather than consumption-based emissions, which takes into account emissions created from goods and services that are consumed in the local area but produced elsewhere.

3.18 According to SCATTER data, the total level of emissions in Wiltshire is 3.465m tCO₂e per annum. Based on a population of 498,000 this gives emissions per head of 7 tCO₂e per annum. The following pie charts demonstrate the sources of emissions, which helps to direct where the focus for carbon reduction needs to be to dramatically cut the amount of carbon produced in Wiltshire.

¹⁴ <https://scattercities.com/>



3.19 It is clear from the SCATTER output data for Wiltshire that the biggest challenges we face in seeking to become carbon neutral by 2030 will be tackling unsustainable travel patterns/modes and making significant strides towards de-carbonising existing and future building stock. To achieve these goals, the Local Plan will need to influence the pattern and form of future development, support local communities to deliver renewable energy schemes, encourage investment in a green economy, as well as influence a shift towards sustainable modes of transport. But in a wider sense, the Local Plan will also need to provide support for actions set out within the

Council's emerging Climate Change Strategy to tackle the challenge of de-carbonising existing buildings wherever practicable.

Consultation Question A1:

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

Consultation Question A2:

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

Consultation Question A3:

How should these actions be delivered and measured?

4. Performance of existing Wiltshire planning policy and scope for change

Wiltshire Core Strategy

- 4.1 The NPPF anticipates that plans should 'be prepared with the objective of contributing to the achievement of sustainable development.' Part of achieving sustainable development is to 'mitigate and adapt to climate change, including moving to a low carbon economy'.
- 4.2 In the Wiltshire Core Strategy (WCS)¹⁵, climate change is reflected in the Spatial Vision (3.1) and as an objective of the WCS (3.5) and policy outcomes are expressed against this. It has been recognised that implementation of policies has not been helped by changes in national policy and legislation introduced through Written Ministerial Statements¹⁶.
- 4.3 A review of existing planning policies within the WCS that relate to the theme of climate change mitigation and adaptation has been undertaken. It outlines what the strategy seeks to achieve, discusses targets, effectiveness, thematic gaps and evidence, as well as commenting on general conformity with NPPF/PPG. This can be found in **Appendix 1**.
- 4.4 It is apparent from this review that the policies in the WCS will need to be adapted and improved to tackle the effects of climate change, meet more recent legislative requirements and assist in seeking to realise the Council's ambition for carbon

¹⁵ <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

¹⁶ <https://www.gov.uk/government/speeches/planning-update-march-2015>

reduction by 2030. An adequate monitoring framework will also be important to ensure effectiveness of policy in the future.

- 4.5 The Council's emerging strategy papers highlight a number of key initiatives for tackling climate change including the need to ensure the distribution of new development delivers greater levels of self-containment and reductions in unsustainable travel patterns. Indeed, these important guiding principles are at the heart of the methodology for identifying site options and determining reasonable alternatives for further detailed assessments as the plan making process progresses.

Summary points to note from the review of the existing WCS policies related to climate change adaptation, resilience and mitigation are:

- Since the WCS adoption, there have been changes and addition of new legislation and technical guidance - e.g. withdrawal of the code for sustainable homes and amendments to Building Regulations;
- Although there are some policies relating directly to climate change (Core Policies 41 and 42), mitigation and adaption practices really need to be embedded throughout other policies; and
- 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 - to measure the effectiveness of the policies there needs to be a new monitoring programme in place.

Scope for change – how can local plan policies do more to address climate change?

- 4.5 A key element of the Wiltshire Core Strategy (WCS) review and preparation of the Local Plan will be assessing whether the current policies go far enough to tackle climate change. 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. This will support the scope for updating policy, developing new policies or whether a whole new climate change objective is required.
- 4.6 In line with the recommendations of the local plan focus group and draft recommendations of the Global Warming and Climate Emergency Scrutiny Task Group, five themes have been identified for closer investigation and evidence gathering. These thematic areas are considered at this stage of the plan making process to be fundamental in helping to tackle climate change and reversing biodiversity loss in Wiltshire. They are broad in ambit to ensure that establishing sustainable communities through the delivery of place shaping planning policies is undertaken holistically to provide synergistic solutions for adapting to and mitigating the effects of climate change. For example – planning for the management of water in new developments can provide opportunities to deliver drainage schemes, provide new habitats, help tackle urban heating issues and so on.

The identified themes are:

1. Tackling flood risk and promoting sustainable water management
2. Enhancing green/blue infrastructure and biodiversity
3. Delivering sustainable design and construction methods in the built environment
4. Encouraging sustainable renewable energy generation and management
5. Promoting sustainable transport, active travel and improving air quality

4.7 Initial analysis has been conducted to understand how the policies relating to these themes in the WCS compares to that of Local Plans which have been adopted more recently. Differences have been identified in order to establish gaps in the current WCS policy and improvements that could be made to keep the policy up to date with current good practice. The detailed analysis is presented in a series of policy review tables in **Appendix 1**. Some summary points from the analysis can be found below.

4.8 **Tackling flood risk and promoting sustainable water management**

- For this theme there is a limit to how varied each Local Plan would be as the policy response is largely guided by clear guidance in the NPPF and associated PPG, supported by the authority's Strategic Flood Risk Assessment and associated evidence.
- However, it is clear that as the effects of climate change become more prominent, it is important to plan well into the future, taking into account the predicted changes in rainfall and temperatures. Such factors will likely impact on the amount of land that can accommodate development safely.
- Wherever practicable, it is and will continue to be important to incorporate Sustainable Drainage Schemes (SuDS) within planned development schemes. Such schemes should be planned to accommodate all water emanating from hard standings and developed areas with capacity to achieve at least the greenfield runoff rate plus 20% betterment to ensure flood risk isn't increased or exacerbated elsewhere. SuDS should also be designed into developments to act as multifunctional spaces that manage water and also help deliver biodiversity and benefits for the local environment.
- There will also need to be a shift towards an increased focus on utilising and creating Green/Blue Infrastructure (GBI) for managing wider flood risk within catchments, this demonstrating the integrated nature of the themes identified for tackling climate change. Such work will be supported by the Council's emerging GBI strategy
- Under a 'no change scenario'¹⁷, although policy would inevitably guide development to follow the most up to date policies from the NPPF and Environment Agency, opportunities may be missed in terms of incorporating multi-functional GBI and SuDS schemes into development, or going above and beyond national guidance to protect existing homes and businesses from flooding.

4.9 **Enhancing green/blue infrastructure and biodiversity**

¹⁷ A no-change scenario would effectively mean rolling forward existing planning policy

- The objective to protect and create Green Infrastructure (GI) exists in the Wiltshire Core Strategy (Core Policy 52). However, the ambition to make significant enhancement of existing assets by proactively planning for the incorporation of GBI in new developments, or through waterway improvements was potentially an opportunity that hasn't been explored to its full potential. This is now being addressed through the Council's emerging GBI Strategy, which will be an important piece of evidence for the policies in the emerging Local Plan.
- The ability for GBI to act as a crucial aspect of natural flood resilience (e.g. SuDS, the creation of wet woodlands, flood plain restoration schemes, managed wetlands etc) and flood protection for homes and businesses appears to be an opportunity which the current policy doesn't mention and should now cover.
- There are numerous other benefits which GBI offers which could be further explored, which demonstrate the integrated nature of these policies, include carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement.
- Under a 'no change scenario', although GI would still be encouraged, the wide-ranging benefits of GBI would not be fully appreciated. There is also a lack of explicit reference to blue infrastructure in the current policy. It is therefore recommended that the existing policy be reviewed to align with the emerging GBI Strategy, which ultimately will seek more, higher quality and better connected GBI.

4.10 **Delivering sustainable design and construction methods in the built environment**

- For this theme there are two policy areas which fall behind current ambition. Firstly, since the loss of the Code for Sustainable Homes (CfSH), there is a lack of design and efficiency standards to follow in order to direct new development towards a carbon neutral approach. Secondly, there is currently a lack of guidance towards retrofitting existing homes to become carbon zero. This latter point may well be covered in due course within the Council's emerging Climate Change Strategy.
- A number of sustainable design, construction and assessment codes do exist, and there is also an option of supporting a Wiltshire specific design code and assessment regime. This may be a matter for the emerging Climate Change Strategy to tackle as a single, unified toolkit for assessing the performance of buildings would support and help implement policies and proposals set out within the Local Plan.
- There are numerous construction methods in operation across the country – e.g. Modern Methods of Construction and Passivehaus. Such methods generally focus on the performance of construction materials to ensure that buildings are more energy efficient (the so called – fabric first model). However, without an agreed, clear direction set out in planning policy, problems with enforcement and objections on design grounds are possible.
- There is a need to ensure that developments are designed to reduce and reuse waste. Existing policies set out with the Council's current Minerals and Waste Development Plan Documents go some way towards implementing the national waste hierarchy, but more could be done to influence significant reductions in construction waste arisings and disposal choice.

- More could be done to support a green construction economy. With the growth in the use of recycled and prefabricated building materials, encouragement should be given to more innovative construction processes and the industries that support low to zero carbon developments.
- This theme is closely linked to the theme of energy as the way homes are heated and the way the energy is produced will need to change in order to meet zero carbon targets. This will be particularly important when planning for growth over the period up to 2036 as the Council is seeking to achieve net carbon neutrality by 2030. Achieving this will be challenging and will require a concerted effort from planners, developers and regulators to improve significantly the performance of new build, as well as retrofitting existing building stock.
- The introduction of electric vehicle (EV) charging points should also be tackled through land-use policies and aligned with the initiatives being developed to support the Council's Local Transport Plan, as well the encouragement of active and sustainable modes of transport.
- Under a 'no change scenario', although homes and buildings would still be encouraged to adapt to climate change and reduce energy demand, the current policy (Core Policy 41), if rolled forward, would not be enough to create a carbon zero, resilient house and building stock. It may also mean that existing homes and businesses will not be capable of adapting quickly to meet carbon reduction targets or tackle impacts such as over-heating.

4.11 Encouraging sustainable renewable energy generation and management

- As it stands, Core Policy 42 supports standalone renewable energy installations. However, there is a lack of guidance on maximising on-site renewables - e.g. implementing solar PV on roofs. Notwithstanding that point, the policy has, in part, been overtaken by more recent national planning policy advice, particularly in respect of wind energy generation. For this reason alone, the current policy needs to be reviewed.
- This theme is closely linked to sustainable design and construction as buildings will need to become more energy efficient, may need to support on site renewables and include infrastructure such as EV charging points.
- A gap in the Council's current evidence includes how the energy system will change in the future. An energy transition programme is expected as high carbon producing sources are replaced with cleaner energy and energy demand increases due to the phasing out of gas and the introduction of domestic electric heating and electric vehicles are increasingly phased in. It is unclear whether the current energy infrastructure will be able to cope with future demand. This highlights the importance of improving the energy efficiency of homes; and, for ongoing engagement with energy companies such as Scottish and Southern Energy Network to plan for grid reinforcement measures where needed.
- Evidence relating to the opportunities associated with community energy schemes is also lacking. This could be an important opportunity in providing clean energy without constraining the current grid infrastructure and may well be an area of policy that neighbourhood planning teams look to the Council to assist with.

- Under a 'no change scenario', there is little to support on-site or off-grid community energy schemes which could help to take pressure off the existing infrastructure, and thereby help Wiltshire in seeking to be carbon neutral by 2030. There is also little guidance currently on regulating and improving the energy efficiency within new and existing buildings. As things currently stand, it is assumed that current Building Regulations are to be relied upon to drive up energy efficiency. Moreover, it remains to be seen whether the Government's proposals for a New Homes Standard will be legislated, or whether new proposals, such as those set out in the recent Planning White Paper, will come into force.
- It is possible that the current policy wouldn't keep up with the inevitable change the energy market is likely to see, leaving developments potentially unviable as the existing infrastructure may well be incapable of meeting projected demand. Allied to this, without positive policy support for innovative renewable energy schemes, existing and future local communities may lack opportunity to provide any of their own energy.

4.12 **Promoting sustainable transport, active travel and improving air quality**

- As transport is the sector which emits the most carbon in Wiltshire, there will need to be a big change in travel patterns in order to significantly reduce carbon emissions. This can be tackled in a number of ways, including through aligning job creation with housing, reducing the need to travel by working more at home, supporting modal shift and use of greener vehicular technology.
- This theme aligns closely with the preparation of the Local Transport Plan and other Local Plan themes such as the GBI Strategy, sustainable energy generation/capture and the Council's review of its Air Quality Strategy.
- Due to on-going COVID-19 crisis, there has been a big shift this year to seeing many people working from home more, or fulltime and thus travelling less, alongside an increase in active travel as people have taken up walking and cycling to avoid using public transport. These 'enforced' and necessary changes to everyday life have demonstrated that society can adapt and hence encouragement should be given to initiatives to reduce the need to travel by increasing self-containment within Wiltshire's settlements, a theme explored in the Emerging Strategy Paper.
- Planning and supporting a move towards electric or hydrogen powered vehicles, including electric public transport and road haulage may be required, but this is likely to be tackled via non land-use planning means in the main. A gap in the Council's current evidence includes scoping the cost and feasibility of delivering such measures as EV charging points and the necessary infrastructure that would entail is needed to help determine development viability as well as supporting public/private sector investment in retrofitting such technology into existing building stock.
- In a 'no change scenario', the current policies of the Core Strategy direct development towards accessible and sustainable locations. However, the policies have not necessarily kept up with changing trends such as increased active travel and shift towards electric/hydrogen powered vehicles, which both need the infrastructure and facilities to develop sustainably. The Department for Transport's emerging Transport Decarbonisation Plan will play an important part in reviewing existing policies.

5. Challenges to be addressed through the Local Plan Review

- 5.1 In 2019, Wiltshire Council acknowledged a climate emergency. It agreed to seek to make itself, as an organisation, as well as make the County carbon neutral by 2030. Although reducing emissions is a crucial part in tackling climate change, it is also vital that plans are put in place to adapt to the impacts associated with climate change.
- 5.2 Mitigating and adapting to climate change, as well as arresting the decline in ecology are big challenges, heightened by the urgency within which plans need to be reviewed and adopted. The Local Plan will be an important part of the strategy to tackle climate change in Wiltshire, alongside the Council's emerging Climate Strategy, Local Transport Plan 4 and so on. A scope for change has been outlined in Chapter 4 including posing whether a new objective for climate change is needed, or whether it is an interdisciplinary topic which should be ingrained in numerous policies in the plan.

Developing draft land-use policies for tackling climate change and biodiversity decline

- 5.3 For each of the five themes evidence and ideas to be integrated into policy options have been developed for consultation building on analysis in this document. This information provides a starting point to what can be expected from policies and allows questions to be asked on the detail and ambition to be strived for.
- 5.4 At this stage of the process, it is too early to define or even outline specific policy wording. It is more pertinent to question what is possible at this stage. Therefore, each policy theme box is followed by consultation questions which enable wider contributions and discussion.

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management

- Development should be planned for with the future in mind, taking into account the changes in seasonal rainfall, which will impact upon areas that are currently thought of as developable.
- Development should be planned in accordance with the Wiltshire Strategic Flood Risk Assessment and latest Environment Agency flood risk information including the latest predictions for climate change.
- New built development should be located in Flood Zone 1 and should consider flood resilient design methods.
- Where technically feasible, all new development should incorporate Sustainable Drainage Systems (SuDS) to ensure water is positively managed extensively to achieve a greenfield runoff rate plus 20% betterment. Such measures should be designed to ensure flood risk isn't increased or exacerbated elsewhere.
- SuDS should be designed as multi-functional features within new development to maximise benefits including biodiversity, carbon capture, enhancing a sense of place, health and wellbeing (e.g. supporting micro-climates for tackling summer heating).

- Support schemes for retrofitting SuDS in existing developments where appropriate and technically feasible.
- All new development should be designed in a manner that limits the daily consumption and disposal of water.
- All new development should support the collection and re-use of rainwater and grey water.
- Where technically feasible, all areas of hardstanding in developments should be constructed using permeable materials to reduce surface water run-off.
- All new development should utilise and, where necessary create natural flood management measures – e.g. creation of wet woodland, building leaky dams, influencing arable farming methods.

Consultation Question B1:

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

Policy Theme 2 – Enhancing Green/Blue Infrastructure (GBI) and biodiversity

- Development should be ambitious in enhancing and creating new GBI assets.
- This should largely be guided by Wiltshire’s emerging GBI Strategy, but all major development schemes should be supported by an audit of existing GBI that is used as a template for planning areas of built and natural form.
- GBI should be accessible for all and should be designed to incorporate the benefits, such as carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement.
- 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.
- All areas of biodiversity net gain should be protected and positively managed through a long-term (minimum 30 years) programme of maintenance.

Consultation Question B2:

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

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

- 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. 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.

- All new development should seek to reduce, recycle and reuse construction waste.
- A Council-wide strategy should be developed to support the evolution of a green construction industry that utilises sustainable, prefabricated materials and low to zero carbon energy solutions.
- The UK Green Building Council (UKGBC) has laid out a clear framework for the achievement of net zero carbon to follow on from the now defunct Code for Sustainable Homes and meet the requirements of the UK's national net zero carbon target. The Local Plan could set standards for all new built development to follow. Such standards would need to be clear, easily implemented and not put at risk the viability of development. These factors need to be explored more through the plan making process.
- New development schemes should be supported by a Sustainability Statement designed to demonstrate how the requirements set out above would be met. Existing standards (e.g. BREEAM) and reporting methodologies could be used in evidence.
- The introduction of Electric Vehicle (EV) charging points should also be tackled through land-use policies and aligned with the initiatives being developed to support the Council's Local Transport Plan, as well the encouragement of active and sustainable modes of transport.
- Where practicable, support should be given to decarbonising and modifying existing buildings. This may include replacing gas boiler systems with ground/air source heat pumps, improving thermal insulation, replacing windows, adding solar panels to the roof spaces of residential and commercial buildings.

Consultation Question B3:

If we are to successfully plan for a net zero carbon future through sustainable design and construction, would the measures set out above go far enough?

Consultation Question B4:

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

Consultation Question B5:

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

Consultation Question B6:

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

For example, should we rely on current Building Regulations, or the Government's proposed 'New Homes Standards' (or any successor scheme, such as that promoted

through the Planning White Paper) to achieve an uplift in the performance of new buildings?

Consultation Question B7:

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

Policy Theme 4 – Sustainable Energy Generation and Management

- Where practicable and achievable, all new development should incorporate systems for producing and potentially storing ultra-low or zero carbon energy. This could take the form of solar panels on all new residential and commercial roofs, 100% electric heating, cooling and energy systems in all new buildings powered by air or ground source heat pumps, or through off-grid solutions such as combined heating and power/combined cooling heating and power generation systems.
- 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.
- Support should be given to map and utilise potential energy exchanges, for example buildings that produce significant amounts, or require significant amounts of energy working together to address energy output (usually heat) and consumption (usually heat and/or cooling).
- The Council, development industry and energy providers (Distribution Network Operators/Distribution Service Operators) should plan for growth in a collective manner to determine the need for and scale of investment to support grid resilience and address reinforcement issues.
- Support should be given to retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production. This will likely be challenging in Conservation Areas and on Listed Buildings, but there are ways to incorporate such measures as solar panels, secondary glazing and non-gas fuelled heating systems in a sympathetic manner.

Consultation Question B8:

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

Consultation Question B9:

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

Consultation Question B10:

Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?

Consultation Question B11:

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

Policy Theme 5 - Sustainable Transport and Air Quality

- As set out in the Emerging Strategy paper, 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. 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, and increasing modal shift to public and active transport, and the take up of electric/hydrogen fuelled vehicles allied to a green energy network of charging/refuelling points.
- Wiltshire has designated a number of Air Quality Management Areas. Existing policies and strategies are effectively monitoring, managing and improving air quality in these areas.
Tackling air quality will be a significant step towards addressing the effects of climate change and loss of biodiversity. The Local Plan will likely need to set policies that control emission of harmful gases as well as particulate matter (e.g. PM2.5 and PM10).

Consultation Question B12:

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

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? *For example, how could the Council use planning policy to accelerate the roll-out of electric vehicle charging points in existing building stock? What challenges might impact policy implementation? How might these be overcome?*

Consultation Question B14:

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

Consultation Question B15:

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

6. Next steps

- 6.1 The next steps will include gathering further evidence required to support new or updated policies. Some of this evidence is already be available and communication across departments will be crucial in gathering all available information.
- 6.2 The forthcoming consultation in January 2021 will be important in understanding the thoughts of various stakeholders and could give more insight into what policies will be most practicable in achieving carbon neutrality. Therefore, the outcomes from the consultation will be taken into account and utilised to help develop policies for the Local Plan that materially improve climate change resilience through adaptation and mitigation measures.

Appendix 1

Climate Change Policy Analysis – WCS Policies (a) and other exemplar Local Plans Policies (b)

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
Strategic Objective 2: addressing climate change	<p>Self-containment and reducing the need to travel:</p> <ul style="list-style-type: none"> Deliver a sustainable pattern of development, focussed at Principal Settlements and Market Towns. <p>Reducing fuel poverty:</p> <ul style="list-style-type: none"> Maximising the supply of energy and heat from renewable sources. <p>Sustainable construction:</p> <ul style="list-style-type: none"> Ensure new development incorporates sustainable building practices and, where possible, adapt existing building stock. <p>Climate change adaptation:</p> <ul style="list-style-type: none"> New buildings (residential /commercial) to incorporate high energy efficiency standards. New buildings to incorporate climate change adaptation measures. 	<p>Comments:</p> <p>The objective remains laudable but needs to be reviewed to address the current legislative/national policy position – e.g. deletion of the Code for Sustainable Homes; change in Building Regs.</p> <p>The objective could usefully be amended to provide greater support for green enterprise and retrofitting existing building stock.</p> <p>Current monitoring target(s): 40-45% of new housing completions in Principal Settlements, 40-45% of new housing completions in Market Towns, 10-20% elsewhere.</p> <p>Effectiveness: Data required potentially from our Land Use Monitoring System (LUMS) to assess/judge effectiveness more fully.</p> <p>Gaps: Lack of clarity on certain themes – e.g. links between sustainable waste management,</p>	<p>Section 14 of NPPF, paras 148-169</p> <p>Para 148: 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>Para 149: 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. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
	<p>Waste:</p> <ul style="list-style-type: none"> New development to be supported by sustainable waste management. 	<p>energy generation, combined heating/cooling/power.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Data required on energy efficiency of new builds and existing building stock, including take-up of Building Regs standards. Data required on developments served by renewable energy/combined Heating Cooling and Power. Data required on the potential for renewable energy generation including the feasibility/viability of: Solar PV arrays, ground source heat pumps and micro-energy generation. The current objective doesn't bind us to a specific carbon neutrality target. SFRA Level 1 – <u>completed</u> and includes an assessment of cumulative effects. This evidence will be critical in assessing options for new site allocations. We will need to consider climate change adaptation measures in new build, as guided by the climate change allowances set out in the SFRA. 	<p>provision for the possible future relocation of vulnerable development and infrastructure.</p> <p>Para 150: New development should be planned for in ways that: (a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and (b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the government's policy for national technical standards.</p> <p>Para 151: To help increase the use and supply of renewable and low carbon energy and heat, plans should: (a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
			<p>(including cumulative landscape and visual impacts);</p> <p>(b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</p> <p>(c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p> <p>Paras 153 and 154 set out requirements for planning applications in respect of encouraging decentralisation of energy supply, efficient use of land and high-quality design.</p> <p>The current objective addresses the main thrust of national policy in terms of:</p> <ul style="list-style-type: none"> • Directing major development towards higher order settlements; • Aiming to reduce out-commuting and unsustainable travel patterns; • Supporting sustainable construction in new build and adaptation of existing building stock. • Supporting the maximisation of renewable energy generation.

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
			<ul style="list-style-type: none"> Supporting design in new build that adapts to climate change. <p>However, the objective and the policies that flow directly from it, do not go as far as the Framework. For example: setting out a positive strategy for energy through identifying locations for renewable energy generation.</p> <p>The objective needs to address planning and flood risk as well as adaptation.</p>
CP 41 Sustainable construction and low-carbon energy	<p>The policy seeks to achieve a step-change in energy efficiency within new buildings and the maximisation of renewable/low carbon energy.</p> <p>The policy is broken down into 4 sections covering:</p> <p>Climate change adaptation:</p> <ul style="list-style-type: none"> Design measures to reduce energy demand. Maximising opportunities to take advantage of natural light and heat, as well passive ventilation to address cooling in the summer. <p>Sustainable construction:</p>	<p>Comments: Whilst the objectives and anticipated outcomes from this policy generally conform with national policy, we do not have data to judge effectiveness.</p> <p>In reviewing the policy, the main issues will be:</p> <ul style="list-style-type: none"> Potential need to set out a clear strategy to achieve carbon neutrality by 2030. The deletion of the CfSH and no replacement legislation setting out measures to achieve carbon neutrality, or indeed define what Wiltshire Council is aiming to achieve in this regard (see Notice of Motion and declaration of a climate emergency). 	<p>Section 14 of the NPPF, paras 148-154</p> <p>Whilst the objectives at the heart of the Policy resonate with national policy, sustainable construction practice has moved away from such measures as the CfSH. Whilst we can set local 'standards', we would need a robust evidence base to work from.</p> <p>At this stage, we do not have such evidence for residential development, but some in respect of commercial development linked with BREEAM standards. The current M3 system (and any new system) may well provide data on permissions granted where compliance with local standards was a conditional requirement. We need to work with Development Management and Building Control on this point</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence <i>(Monitoring targets drawn from the Core Strategy Monitoring Framework)</i>	General conformity with NPPF/PPG
	<ul style="list-style-type: none"> New homes to achieve CfSH Level 4 (in full). Conversions of property to residential use to achieve BREEAM Homes “Very Good” standards. All commercial development to achieve BREEAM “Very Good”, rising to “Excellent” from 2019. <p>Existing buildings:</p> <ul style="list-style-type: none"> Encouraging retrofitting measures to improve energy performance in existing buildings by: <ul style="list-style-type: none"> Reducing energy consumption through energy efficiency; Using renewable or low carbon energy from a local/district source; Using micro-energy generation. <p>Renewable and low-carbon energy:</p> <ul style="list-style-type: none"> All proposals for “major development” to be supported by a Sustainable Energy Strategy. 	<ul style="list-style-type: none"> Addressing retrofitting of climate change adaptation measures in existing buildings. Tackling energy demands and supply – the need to diversify and decentralise the energy market. The need to consider cooling within decentralised energy solutions (Combined Heat/Cooling and Power – CHCP). The potential need to set out locations for energy generation, particularly wind technology. The need to set standards that reflect the Government’s technical standards, building regulations and potentially beyond. <p>Current monitoring target(s): 100% of new build to meet targets set by policy. % new development meeting Code 3 of the code for Sustainable Homes from Core Strategy adoption (2015) to 2013, Level 4 to 2016 and Level 5 from 2016 onwards and or/ ‘excellent’ BREEAM.</p> <p>Effectiveness: Significant gap in evidence. Also, due to the Government’s ‘deletion’ of the CfSH and</p>	<p>Compliance with Building Regulations (BR) remains. Parts G (water efficiency) and L (energy efficiency) are therefore relevant in this regard and we should investigate whether we have data on BR compliance through discussions with Development Management and Building Control teams.</p> <p>Whilst the primary objectives of Core Policy 41 remain relevant and broadly in line with national policy, they do not go far enough in terms of accelerating the delivery of higher energy and water efficiency performance standards in new buildings.</p> <p>Whether through a policy review, or a link to the Council’s Climate Strategy, more emphasis could usefully be applied to supporting retrofitting of existing buildings and economic investment in green/sustainable building technologies.</p> <p>Working with the development industry and the Council’s own building company (Stone Circle), evidence will be needed to understand the costs of delivering zero-carbon buildings. This will assist in the viability assessment that will be needed to support the Local Plan preparation process.</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
		<p>'insertion' of optional technical standards/space standards/updates to Parts G and L of Building Regs we could investigate options for establishing a consolidated 'standard' for Wiltshire.</p> <p>Gaps: As above.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Carbon Budgets for the period up to 2036. • Climate Change Act, 2008 (as amended). • Building Regs/Building for Life 12. • Data required to cover the energy demand across Wiltshire and supply side decentralisation potential – i.e. what solutions are out there and how feasible would they be for Wiltshire (wind, solar, hydroelectric, geothermal, landfill gas/energy from waste treatment?) • Data required on the costs of moving towards a decentralised + micro-energy generation future in new buildings. • Data required on retrofitting energy generation solutions to existing building stock. 	
CP 42 – Standalone	The policy seeks to encourage proposals for low-carbon, standalone	Comments:	Section 14 of the NPPF, paras 148-154

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
renewable energy installations	energy generation facilities. Schemes would need to be supported by a landscape character assessment and pay due regard to locational constraints such as biodiversity.	<p>Again, the primary objective of this policy remains relevant and conforms with national planning policy. However, as written, the policy wording appears to set out where it would not necessarily be appropriate to bring forward stand-alone renewable energy installations.</p> <p>Considering the Council Motion and the legal imperative to address climate change, the policy could usefully be reviewed to provide a more positive strategy for tackling sustainable energy generation through decentralising the existing supply chain.</p> <p>Current monitoring target(s):</p> <ul style="list-style-type: none"> • Increase the amount of renewable energy capacity in Wiltshire in Mega Watts (MW). • MW Renewable energy capacity installed by type. <p>Effectiveness: Planning applications for solar PV arrays on farms were prevalent during the era of feed-in tariffs. Since the changes to feed-in tariffs, the incentive to erect solar PV has diminished markedly.</p>	<p>The policy broadly conforms with national policy (paras 151-154), but it stops short of identifying opportunities to identify areas for renewable and low-carbon energy sources.</p> <p>The evidence prepared for the WCS looked at the potential for wind energy generation across the County, but this wasn't taken forward. Following the adoption of the WCS, a Written Ministerial Statement in March 2015 altered national planning policy, particularly in respect of the consideration of wind energy schemes and the need to set out allocations in a development plan for such technology.</p> <p>The evidence also looked at the potential for Combined Heat and Power (CHP) and underpinned the 'Trowbridge Low-Carbon, Renewable Energy Network' proposal set out in CP30. Since adopting this policy, the opportunity to deliver a local energy network based upon County Hall has not been taken further. If such a scheme remains an aspiration, further evidence gathering would be needed, linked to the Council's aspirations for the redevelopment of its East Wing campus.</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
		<p>Currently, there are very few low-carbon energy/decentralised energy solutions in the County and yet more could potentially be done with water, waste et al.</p> <p>Gaps: Monitoring the delivery of renewable energy facilities and installed capacity has been limited to date.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Local Energy Strategy (produced for the LEP) • Data required to cover the potential market for decentralised energy generation and Combined Heating Cooling and Power. Is there scope to develop local energy markets (ESCOs) within major development sites? • Data required on the feasibility/viability of pursuing decentralised, low-carbon energy solutions across Wiltshire (looking at energy potential from all sources and scales). 	
CP 52 – Green infrastructure	This policy seeks to maximise the retention and enhancement of Wiltshire’s green infrastructure network.	<p>Comments: The objective of protecting and enhancing the green infrastructure network across Wiltshire resonates with national planning policy. However, the policy is set within the context</p>	<p>Section 14, paragraphs 149 and 157 Section 15, paragraphs 170 and 174</p> <p>The policy is in general conformity with national policy but could be usefully be amended to</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
	<p>To achieve this aim, the policy sets out 5 criteria covering <i>inter alia</i>: retention/enhancement of green infrastructure; open space standards; long-term management measures; contributions towards the delivery of on/off-site infrastructure.</p> <p>Proposals for major development will be expected to provide an audit of existing green infrastructure within and around the site, along with a statement setting out how this will be retained and enhanced.</p>	<p>of legacy policies in respect of open space standards. This needs to be rationalised and is being tackled through the Open Spaces Study and the Green and Blue Infrastructure Strategy.</p> <p>These two evidence documents will be critical in maximising the benefits that green/blue infrastructure can bring to place shaping in terms of helping to tackle climate change and reverse biodiversity loss</p> <p>Current monitoring target(s):</p> <ul style="list-style-type: none"> • Deliver key green infrastructure projects Increase quantity and quality of green infrastructure. • Progress against outputs and targets set within the Wiltshire GI Strategy. <p>Effectiveness: Whilst the policy appears to be successful, more could be done to ensure that the Local Plan addresses legal requirements and the Council's declaration of a climate emergency in Wiltshire.</p>	<p>maximise the benefits that blue infrastructure also brings to place shaping within local communities.</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
		<p>Gaps: Potentially significant gaps in our monitoring of policy effectiveness. That said, recent measures designed to control phosphates and nitrates entering the River Avon demonstrate the Council's commitment towards achieving improvements to water quality within what is a significant European designation.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • An audit of open space provision is being addressed through the Open Spaces Study. • A revised open space standard for Wiltshire needs to be set. • A Green and Blue Infrastructure (GBI) Strategy is being progressed and this will assist in developing place shaping policies for the Local Plan. • Identified GBI projects will need to be costed and built into our viability assessment. 	
CP 53 – Wiltshire's canals	This policy seeks to safeguard the historic routes of Wiltshire's canal network with a view to their long-term re-establishment as navigable routes.	<p>Comments:</p> <p>Current monitoring target(s):</p> <ul style="list-style-type: none"> • Prevent inappropriate development. • Restoration of waterways 	The policy generally accords with national policy insofar as canal restoration could lead to improvements in green infrastructure, biodiversity, cycling/walking routes, the local economy.

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
		<ul style="list-style-type: none"> • Improve facilities. • Number of applications permitted contrary to policy. • Length of completed waterway in metres. <p>Effectiveness: Whilst a scheme for the restoration of Melksham Link (Wilts and Berks Canal) has been submitted, no permission has been granted in the last eight years.</p> <p>No evidence to suggest that the historic route of canals through Wiltshire have been compromised.</p> <p>Gaps: As worded, the policy seeks to safeguard historic routes, but it does not express how a planning application for an off-line canal building project would be considered.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Feasibility/viability of canal restoration. 	<p>However, without a clear mechanism for supporting the delivery of canal restoration, it is not clear that the policy will be effective if carried forward as worded.</p>
CP 55 – Air quality	<p>The policy seeks to ensure that new development does not exacerbate areas of poor air quality.</p> <p>The policy is intended to be read in conjunction with the Council's Air</p>	<p>Comments: Improving air quality by reducing NO₂ and particulate matter emissions (PM₁₀ and below) remains a corporate priority. Reversing exceedances, particularly in AQMAs, will</p>	<p>The policy is broadly consistent with national policy but could be more specific and linked to target outcomes, particularly within defined Air Quality Management Areas (AQMAs).</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
	<p>Quality Action Plan/Air Quality Strategy. Indeed, the policy anticipates that mitigation measures will make a positive contribution towards the aims of these documents.</p> <p>The policy seeks to reduce exceedances of nitrogen dioxide (NO₂) and particulate matter emissions – principally PM_{2.5} and PM₁₀.</p>	<p>enable us to meet EU and national targets. However, more could be done.</p> <p>Current monitoring target(s):</p> <ul style="list-style-type: none"> No applications permitted contrary to the advice of Wiltshire Council on the grounds of air pollution that cannot be mitigated. <p>Effectiveness: Evidence suggests that in overall terms, air quality across Wiltshire is generally good. That said, air quality remains an issue in a number of towns, including those like Westbury where an Air Quality Management Area (AQMA) has been designated.</p> <p>There are a number of different measures of air quality, but in certain areas and for certain emissions, the situation is improving as a result of implementing the Air Quality Strategy. In other areas, the position is reversed.</p> <p>Gaps: Emissions to air from vehicles and/or businesses generally fall into the categories outlined in supporting text. However, there is increasing evidence that particulate matter</p>	<p>Also need to ensure that we do not repeat the aims of other policies – e.g. encouraging modal shift; encouraging increased cycling/walking; design in the public realm.</p>

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		<p>emissions below PM₁₀ are leading to health risks.</p> <p>We have legislative requirements to meet, including <u>2008 Ambient Air Quality Directive</u> as well as <u>national targets</u> monitored by Defra.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Baseline evidence needed in respect of NO₂ and all particulate matter emissions at PM₁₀ and below (PM_{2.5}). • Modelling data needed to examine the effect of growth scenarios. 	
<p>CP 57 Ensuring high quality design and place shaping</p>	<p>The policy focuses on design matters. It incorporates a range of criteria designed to improve the character and quality of the built environment.</p> <p>The policy also cross-refers to other policies of the WCS, including CP 41 (Sustainable construction and low carbon energy), CP 61 (Transport and new development) and CP 66 (Strategic transport network).</p> <p>The supporting text to the policy refers to the preparation of a Supplementary Planning Document</p>	<p>Comments: Achieving high-quality design remains a key tenet of national planning policy and hence will need to feature in the new Local Plan.</p> <p>The current policy wording covers a lot of ground, much of which remains relevant in the context of the new Local Plan. However, it would make sense to present a policy that sets out criteria to address carbon neutrality in the built environment. In this regard, a single policy, at the heart of the strategy, linked to the revised climate change objective and therefore tied to the Council's climate change goals would make sense.</p>	<p>Section 12, paragraphs 124-132 Planning White Paper – consultation August 2020</p> <p>The Framework is clear that the “creation of high-quality buildings and places is fundamental to what the planning and development process should achieve”. It follows that high-quality design goes to the heart of sustainable development and should be a key consideration in plan making and development management.</p> <p>Plans should set out a clear vision and expectations in respect of design so that applicants have as much certainty as possible.</p>

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	(SPD) to provide guidance on who to use the policy. Whilst a draft SPD has been prepared, it hasn't been adopted.	<p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Increase proportion of new development scoring highly using the Building for Life Assessment. • % of new developments scored as 'Good' or Very Good' using the Building for Life Assessment. <p>Effectiveness: As per many other policies of the WCS, a lack of monitoring since adoption has created a void in our evidence base. Any new monitoring framework will likely need to be linked with data sources held by other departments – e.g. building control, development management and public protection.</p> <p>Gaps: A lack of monitoring evidence means it is difficult to assess how effective the existing policy has been in improving the efficiency of new buildings. This will need to be addressed if we are to set a series of new standards.</p> <p>In terms of gaps, the primary issue appears to be related to how we use design to help address the Council's declaration of a climate</p>	<p>Design policies should be developed with the local community to ensure they reflect local context and aspirations.</p> <p>All in all, CP 57 generally accords with the policies of the Framework. However, more could be done to deliver a more integrated policy approach to all aspect of design, including moving towards carbon neutrality.</p> <p>In addition, as the proposed SPD has not been finalised/adopted, there is an opportunity to review its contents to set the vision and expectations that national planning policy anticipates. In addition, the SPD could expand on the theme of achieving carbon neutrality in new buildings, setting/complying with standards (e.g. <u>Building for Life</u>), micro-energy generation, heating/cooling/power and the value of open spaces/green infrastructure.</p> <p>New guidance in September 2019 – National Design Guide which forms part of the planning practice guidance (PPG) followed by new National Model Design Code in 2020.</p> <p>Councils that have not produced their own local design guides will be allowed to defer to the government's new National Design Guide and the</p>

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		<p>emergency. We will need to define the scope of any measures to be employed to achieve carbon neutrality.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Evidence of new development achieving building regulations standards (energy/water efficiency). • Evidence of new development achieving Building for Life standards. • Evidence of new development delivering opportunities for active travel. • Evidence of new development incorporating micro-energy generation (solar PV, ground/air source heat pumps etc). 	<p>impending National Model Design Code when considering whether development proposals meet design policy set out in the NPPF.</p> <p>MHCLG has published (2 October 2019) a consultation creating its new Future Homes Standard (<i>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</i>) via changes to building regulations and seeking views on whether to scrap a proposed block on councils setting energy efficiency standards for new homes in their local plans at levels higher than existing building regulations.</p> <p>To date, the Government have not commented on the consultation, or issued final guidance. This may be due to the fact that they have also recently consulted on changes to the planning system through the Planning White Paper.</p> <p>A new green standard for all new build homes that seeks to significantly reduce carbon emissions is proposed to come - e.g. polluting fossil fuel heating systems such as gas boilers banned from new homes by 2025 and replaced with the latest generation of clean technology.</p>

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			<p>And requiring carbon emissions are cut by up to 80% from 2025 for all new homes</p> <p>New national design code is intended to be introduced that will ensure developers build beautiful, well designed homes that people are proud to live in every single local authority across the country will be expected to produce their own design guide which reflects their unique setting, character and history, while meeting the expected national standard.</p> <p>In addition, a Government-backed National Model Design Code will be published in the New Year.</p>
CP 60 Sustainable transport	<p>The policy seeks to:</p> <ul style="list-style-type: none"> • plan for developments to be located in accessible locations; • reduce the need to travel by promoting active travel alternatives and improving the public transport network; • promote demand management measures on the highway network; and 	<p>Comments:</p> <p>The aim of the policy is two-fold:</p> <ol style="list-style-type: none"> 1. To ensure development is located in sustainable locations with good accessibility potential; and 2. To influence travel patterns by reducing the need to travel and encouraging modal shift. <p>In these regards the policy remains broadly in conformity with national planning policy.</p> <p>Current monitoring targets:</p>	<p>Section 9, paragraphs 102-111 Section 12, paragraphs 124, 127 (f)</p> <p>The policy remains in broad conformity with national planning policy. That said, the Framework goes further than the existing policy in several ways – e.g. the prioritisation of pedestrian/cycling in all new developments.</p> <p>The Department for Transport’s emerging Transport Decarbonisation Plan will play an important part in reviewing both Local Plan transport policies and LTP4.</p>

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	<ul style="list-style-type: none"> influence the routeing of freight within and through the county. 	<ul style="list-style-type: none"> Road traffic growth for cars same or lower than the National Transport Model (NTM) 2009 forecast for rural areas throughout the plan period. Increased cycling and pedestrian counts. Increased bus patronage (number of journeys) over the 2010/11 figure. <p>Effectiveness: The policy has not been monitored consistently and hence effectiveness is difficult to assess.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Length of new cycleway/footway created through new development. (Since the introduction of this indicator, local cordon counts have ceased to be supported). Engagement with bus operators on possible pricing strategies/extensions to the network. (Local collection of operator data is still being undertaken). Level of road traffic growth for cars (using the National Transport Model). Cycling and pedestrian counts. BV102 Bus patronage. 	<p>The hierarchy of transport users set out in CP 61 could be linked to a reviewed design policy (CP 57).</p>

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		<p>The Sustainable Transport Team would wish to see new indicators developed to support planning policy that would include: Indicator X: Growth in countywide vehicle-km [using non trunk roads]. Context: National road traffic growth provides a basis upon which to develop a model linked to car type/ownership (e.g. electric vehicle uptake compared with current carbon-based fuel systems). Comment: Benchmarked against National Transport Model (NTM) with local adjustment to reflect Wiltshire's circumstances. Monitored: Yes, via the Department for Transport - local authority traffic estimates.</p>	
CP 61 Transport and development	<p>The policy builds upon CP 60 by seeking reductions in the use of private cars; and encouraging the use of sustainable transport.</p> <p>The policy goes on to seek a prioritisation of transport users within any new development proposals.</p>	<p>Comments: CP60 deals with the bigger picture and CP61 deals with new development issues such as a user hierarchy, transport assessments and travel plans.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • 100% compliance with policy. <p>Effectiveness: Policy has not been monitored rigorously and hence it is not clear on its effectiveness in</p>	<p>Section 9, paragraphs 102-111 Section 12, paragraphs 124, 127 (f)</p> <p>As per CP 60, the principles set out in CP 61 conform with national planning policy.</p> <p>The Department for Transport's emerging Transport Decarbonisation Plan will play an important part in reviewing both Local Plan transport policies and LTP4.</p>

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		<p>securing modal shift or a prioritisation of transport users within the design of new developments.</p> <p>Gaps: The ability of the Council to effectively monitor and enforce travel plans.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Transport Assessments / Statements. • Travel Plans (but limited given gaps – see above). 	<p>New development schemes should, by design, incorporate measures to support the user hierarchy and in doing so, reduce dependency on car-based travel.</p> <p>The use of transport assessments and travel plans is still encouraged/required by the policies of the Framework and Local Transport Plan. Any reviewed policy/policies should seek to maintain support for the use of such tools.</p>
CP 62 Development impacts on the transport network	<p>The policy seeks to ensure developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.</p> <p>And that proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.</p>	<p>Comments: The policy remains broadly in conformity with national planning policy.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Road traffic growth for cars to be the same or lower than the National Transport Model (NTM) 2009 forecast for rural areas throughout the plan period. This modelling work was updated by the DfT in 2018, with a new base date of 2015. • Increase in total distance travelled by cycling, walking and bus to be the same or greater than the NTM forecast for rural areas. 	<p>Section 9, paragraphs 102 and 109.</p> <p>The principles set out in CP 62 conform with national planning policy para 102 (a): the potential impacts of development on transport networks can be addressed.</p> <p>Para 109: Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>This represents a high bar to achieve and hence the reason why it is often difficult to refuse</p>

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		<p>Effectiveness: The policy has not been monitored consistently and hence effectiveness is difficult to assess.</p> <p>Gaps: N/A</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Level of road traffic growth for cars (using the NTM). • Traffic estimates, and local traffic flow data. • The Council has a consistent dataset from Transport Assessments dating back to 2008 (subject to data processing). • Total distance travelled by mode for cycling, walking and bus (using the NTM). • Percentage of new residential development within 30 minutes public transport time of a GP, hospital, school, employment and a major health centre. 	development schemes on highway safety grounds alone.
CP 63 Transport strategies	Packages of integrated transport measures will be identified in Chippenham, Trowbridge and	<p>Comments: The policy remains broadly in conformity with national planning policy.</p>	Section 9, paragraphs 102-111 Section 12, paragraphs 124, 127 (f)

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	<p>Salisbury to help facilitate sustainable development growth.</p> <p>Other urban and rural areas may also develop strategies. All strategies to have full regard for potential impacts upon the Natura 2000 network when assessing potential transport options.</p> <p>The packages will seek to achieve a major shift to sustainable transport by helping to reduce reliance on the private car and by improving sustainable transport alternatives.</p> <p>Each of the packages will consider the implementation of the following:</p> <ol style="list-style-type: none"> i. New and improved networks of routes for pedestrians and cyclists ii. Enhanced public transport services and facilities iii. Traffic management measures iv. Demand management measures v. Selective road improvements vi. Interchange enhancements that are safe and accessible by all vii. Smarter choices measures. <p>These will be supported and implemented through developer</p>	<p>Links through to the Wiltshire Community Plan objective to provide a safer and more integrated transport system with a shift to sustainable transport.</p> <p>Could look at reviewing the list of package measures i-vii against para 110 of NPPF.</p> <p>Query the specific wording referencing Natura 2000 sites, as covered in other WCS policies.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Implementation of packages in Chippenham, Devizes, Trowbridge and Salisbury within the plan period. <p>Effectiveness: The policy has not been monitored and hence effectiveness is difficult to assess.</p> <p>Gaps: Fully funded implementation plans. Comprehensive monitoring regime.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Transport studies/strategies developed for Chippenham, Devizes, Salisbury and Trowbridge. 	<p>Para 103: The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p> <p>Para 110: Within this context, applications for development should:</p> <ol style="list-style-type: none"> a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) create places that are safe, secure and

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	contributions, LTP funding and joint working with partners and others.	<ul style="list-style-type: none"> Limited historic and ongoing monitoring data. 	<p>attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;</p> <p>d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and</p> <p>e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p> <p>The principles set out in policy conform with national planning policy.</p> <p>New development schemes should, by design, incorporate packages of integrated transport measures and measures to reduce dependency on car-based travel.</p> <p>The use of transport assessments and travel plans is still encouraged/required by the policies of the Framework and Local Transport Plan. Any reviewed policy/policies should seek to maintain support for the use of such tools.</p>
CP 64 Demand management	Demand management measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives. There is a focus on car parking management,	<p>Comments:</p> <p>The policy remains broadly in conformity with national planning policy.</p> <p>It would be appropriate now to more fully reflect the decarbonisation agenda in this</p>	<p>Section 9, paragraphs 102-111</p> <p>Section 12, paragraphs 124, 127 (f)</p> <p>The broad principles set out in current policy wording are laudable but need to be reviewed in the light of paragraphs 105 and 106 of the</p>

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	traffic management measures, charging measures and smarter choices measures.	<p>policy to encourage and support the use of low/zero emission vehicles and sustainable modes (NPPF para 110 (e)).</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Increase percentage of completed non-residential development complying with car parking standards. <p>Effectiveness: The policy has not been monitored consistently and hence effectiveness is difficult to assess.</p> <p>Gaps: Comprehensive parking data.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Parking studies/reviews. • Traffic management scheme studies. • National/Sub-regional comparisons, best practice, etc. 	<p>Framework to ensure consistency with national policy.</p> <p>New development schemes should, by design, incorporate packages of integrated transport measures and measures to reduce dependency on car-based travel.</p> <p>The use of transport assessments and travel plans is still encouraged/required by the policies of the Framework (para 111) and Local Transport Plan. Any reviewed policy/policies should seek to maintain support for the use of such tools.</p> <p>It is clear that the effectiveness of existing policy measures is difficult due to a lack of effective monitoring and consistent data. Any updating of policy will need to be aligned with the review of the Local Transport Plan and a common set of measurable monitoring indicators.</p>
CP 65 Movement of goods	The council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks.	<p>Comments: The policy remains broadly in conformity with national planning policy. The NPPF does not specify modes of transport for goods and one could question the validity of the water</p>	<p>Section 9, paragraphs 102-104, 107</p> <p>Links to para 204 (e): Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and</p>

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	It seeks to encourage rail or water transport for freight wherever practical, support for rail freight terminals, suitable overnight lorry parking close to the network and use of the advisory freight network.	<p>network in Wiltshire for goods movement and the evidence this is based upon.</p> <p>Links to the Wiltshire Local Transport Plan 2011- 2026 Freight Strategy. This document will be reviewed as part of the development of LTP4.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Increase proportion of HGVs using the Advisory Freight Network compared with A and B roads in general. <p>Effectiveness: The policy has not been monitored consistently and hence effectiveness is difficult to assess.</p> <p>Gaps: Comprehensive freight data (e.g. HGV origins/destinations).</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Freight Assessment and Priority Mechanism process. • Local freight studies. 	concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

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CP 66 Strategic transport network	<p>The policy seeks to develop and improve the strategic transport network to support the objectives and policies in the Core Strategy and Local Transport Plan.</p> <p>Focus given to the A350 corridor and improvements to the Yarnbrook / West Ashton route and development/improvement at Corsham, Melksham, Royal Wootton Bassett and Westbury.</p>	<p>Comments: The policy remains broadly in conformity with national planning policy.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • Completion of projects identified. <p>Effectiveness: The policy has not been consistently monitored and hence effectiveness is difficult to assess.</p> <p>Gaps:</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Delivery of major road schemes: A350 Chippenham Bypass Improvements (Phases 1, 2 and 3); M4 J17 Improvements. • Development of business cases: A350 Yarnbrook/West Ashton Relief Road; A350 Chippenham Bypass Improvements (Phases 4 and 5); M4 J17 Further Improvements; A350 Melksham Bypass; A338 Southern Salisbury Improvements. • Wiltshire traffic model. • Western Gateway Sub-National Transport Body Rail Strategy. 	<p>Section 9, paragraphs 102, 108 Section 12, paragraph 127 (e)</p> <p>The principles set out in CP66 conform with national planning policy.</p>

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		<ul style="list-style-type: none"> • Swindon and Wiltshire Local Enterprise Partnership Rail Strategy. • Network Rail’s Continuous Modular Strategic Planning process. • Enhancement of Trans Wilts rail service between Swindon and Westbury. • Rail studies: Corsham Station; Wilton Station; Devizes Gateway (emerging Strategic Outline Business Case). • LTP Public Transport Strategy Review. • DfT transport statistics and other limited monitoring. 	
CP 67 Flood risk	<p>Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.</p> <p>All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental</p>	<p>Comments: The policy text broadly accords with the national policy.</p> <p>References to the Wiltshire Council Sustainable Drainage Systems (SuDS) documents/guidance should be added perhaps with the specific run-off rate requirements stated in policy.</p> <p>In addition, through the preparation of the Level 1 Strategic Flood Risk Assessment (SFRA), a 20% betterment over greenfield run-off rates will need to be explored/achieved.</p> <p>Current monitoring targets:</p>	<p>Section 14 of NPPF, paras 148, 149 & 150 and paras 155 – 165.</p> <p>Para 148: 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.</p> <p>Para 149: 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. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as</p>

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	conditions make these measures unsuitable.	<ul style="list-style-type: none"> Decrease proportion of applications granted on areas of higher flood risk compared with Zone 1. <p>Effectiveness:</p> <ul style="list-style-type: none"> No applications permitted contrary to the advice of Wiltshire Council on the grounds of flood risk that cannot be mitigated. <p>As per many other policies of the WCS, a lack of monitoring since adoption has created a void in our evidence base. Any new monitoring framework will likely need to be linked with data sources held by other departments – e.g. building control, development management and public protection.</p> <p>Gaps:</p> <p>Evidence:</p> <ul style="list-style-type: none"> Proportion of applications granted by flood risk area type. Number of planning permissions granted contrary to the advice of Environment Agency on flood defence / water quality grounds. As above, SFRA Level 1 – <u>completed</u> and includes an assessment of 	<p>providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.</p> <p>Para 150: New development should be planned for in ways that:</p> <p>(a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure;</p> <p>Para 155: Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Para 156. Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other</p>

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		<p>cumulative effects. This evidence will be critical in assessing options for new site allocations. We will need to consider climate change adaptation measures in new build, as guided by the climate change allowances set out in the SFRA.</p>	<p>relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.</p> <p>Para 157. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.</p> <p>Para 158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably</p>

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			<p>available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.</p> <p>Para 159. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.</p> <p>Para 160. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its</p>

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WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
			<p>users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p> <p>Para 161. Both elements of the exception test should be satisfied for development to be allocated or permitted.</p> <p>Para 162. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan making stage, or if more recent information about existing or potential flood risk should be taken into account.</p> <p>Para 163. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment¹⁸. Development should only be</p>

¹⁸ [Footnote 50] A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
			<p>allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:</p> <ul style="list-style-type: none"> a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan. <p>Para 164. Applications for some minor development and changes of use¹⁹ should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 50.</p> <p>Para 165.</p>

¹⁹ [Footnote 51] This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
			Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.
CP 68 Water resources	<p>Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible.</p> <p>Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals.</p>	<p>Comments: This policy is broadly in conformity to the NPPF.</p> <p>The Code for Sustainable Homes provided water efficiency standards for new homes that are already widely applied, and Core Policy 41 (presented earlier in the document) sets levels of the code to be met by new homes, while Core Policy 68 requires that water efficiency measures are also incorporated within non-residential development.</p> <p>Current monitoring targets:</p>	<p>Section 14 of NPPF, paras 34, 149, 170 (e)</p> <p>Para 34: Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</p> <p>Para 149: Plans should take a proactive approach to mitigating and adapting to climate change, taking</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
	Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and demonstrate that these would be protected throughout the construction and operational phases of development.	<ul style="list-style-type: none"> Incorporation of water efficiency measures in all non-residential development. <p>Effectiveness: As per many other policies of the WCS, a lack of monitoring since adoption has created a void in our evidence base. Any new monitoring framework will likely need to be linked with data sources held by other departments – e.g. building control, development management and public protection.</p> <p>Gaps:</p> <p>Evidence:</p> <ul style="list-style-type: none"> % of new development incorporating water conservation measures e.g. meters, greywater recycling, rainwater collection % of new development incorporating Sustainable Drainage Systems (SuDS). 	<p>into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.</p> <p>Para 170 e): preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.</p> <p>Any review of the current policy must also consider impacts associated with storm/foul drainage, including the issues generated by phosphate and nitrate loading within the River Avon catchment.</p>
CP 69 Protection of	The policy sets out to avoid and reduce potential environmental	Comments:	Section 15 of NPPF, para 170 (a), 171, 172, 174 – 177, 180

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
the River Avon SAC	<p>effects on the River Avon SAC, incorporating measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures.</p> <p>All development within 20m of the river-bank should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory.</p> <p>Where additional sewage discharges to a Sewage Treatment Works cannot be accommodated without measures to offset phosphate loading, development will be required to undertake proportionate measures (which may include contributions towards those measures identified in the Nutrient Management Plan) to demonstrate that the</p>	<p>The policy accords with NPPF especially with regard to para 176 and the protection of habitats sites including Special Areas of Conservation.</p> <p>Current monitoring targets:</p> <ul style="list-style-type: none"> • 100% compliance with policy (e.g. submission of construction management plans). <p>Effectiveness: As per many other policies of the WCS, a lack of monitoring since adoption has created a void in our evidence base. Any new monitoring framework will likely need to be linked with data sources held by other departments – e.g. building control, development management and public protection.</p> <p>A Memorandum of Understanding (MoU) on the issue of phosphate management within the River Avon catchment designated as a Special Area of Conservation (SAC) was completed and submitted as evidence during the examination of the Wiltshire Housing Site Allocations Plan. The MoU was signed by Natural England, the Environment Agency,</p>	<p>Para 170: Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;</p> <p>Para 171: Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
	proposals would have no adverse effects upon the SAC.	<p>Wessex Water and various stakeholders within the catchment area.</p> <p>The MoU was followed by an Interim Delivery Plan setting out practical and funded measures to implement. In addition, agreement was reached with Wessex Water regarding measures to be planned for and implemented up to and beyond 2025 through their next business plan.</p> <p>Entrade have been appointed to implement the measures in the IDP and are in the process of delivering schemes in the Pewsey Vale. Further work on mitigation measures are under review.</p> <p>Gaps:</p> <p>Evidence:</p>	<p>with other policies in this Framework²⁰; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p> <p>Para 172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads²¹. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development²² other than in exceptional circumstances, and where it can be demonstrated that the development is in the</p>

²⁰ [Footnote 53] Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality

²¹ [Footnote 54] English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters

²² [Footnote 55] For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG
		<ul style="list-style-type: none"> 100% compliance with policy (e.g. submission of construction management plans). 	<p>public interest. Consideration of such applications should include an assessment of:</p> <p>a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</p> <p>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</p> <p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p> <p>Any review and subsequent replacement of existing policy in respect of River Avon will need to attach great weight to the importance of reducing water consumption and the management of phosphates and nitrates within the designated area of the catchment. To achieve this, further work will need to be undertaken in collaboration with Natural England, the Environment Agency and Wessex Water to develop a mitigation strategy that supports growth whilst contributing towards returning the River Avon SAC system to favourable conditions.</p>

Wiltshire Core Strategy: Policy analysis – part a			
WCS Policy	What does the policy seek to achieve?	Comments, targets, effectiveness, thematic gaps and evidence (Monitoring targets drawn from the Core Strategy Monitoring Framework)	General conformity with NPPF/PPG

b.

Exemplar Local Plan Climate Change Policy Analysis – part b			
Flood Risk and Water Management			
WCS policy 67 and 68	Other LA policy	Differences/gaps	Evidence Used
Flood Risk Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk	Camden Local Plan Policy CC3 Water and Flooding²³ – The council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. We will require development to: a. Incorporate water efficiency measures	<ul style="list-style-type: none"> Greenfield run off (peak flow and volume) used as 	<ul style="list-style-type: none"> Catchment drainage strategies Surface Water Management Plans

²³ <https://www.camden.gov.uk/local-plan-documents>

Exemplar Local Plan Climate Change Policy Analysis – part b			
<p>Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice. All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.</p>	<p>b. Avoid harm to the water environment and improve water quality c. Consider the impact of development in areas at risk of flooding (including drainage) d. Incorporate flood resilient measure in areas prone to flooding e. Utilise SuDS in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible f. Not locate vulnerable development in flood prone areas</p> <p>Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.</p> <p>Reading Local Plan EN18²⁴ – Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Tests set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on and off site.</p> <p>All major developments must incorporate SuDS as appropriate and in line with the Government’s Technical Standards. Smaller schemes are encouraged to incorporate SuDS where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal runoff does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees,</p>	<p>measure for managing surface water</p> <ul style="list-style-type: none"> • More specific terms are used in respect of drainage/water management • SuDS – policies seek to prioritise certain drainage routes • Policies are designed so that flooding of property and adjacent land would not occur in a 1 in 100-year event plus climate change buffers • Flood water management and maintenance plans are advocated for all new development • Address potential issues with discharging into water courses in terms of phosphates and nitrates. 	<p>(SWMPs) and Strategic Flood Risk Assessment (SFRA)</p> <ul style="list-style-type: none"> • Catchment Management Plan • Environment Agency (EA) Flood Zone data • Standing advice on ground water • Flood map for planning

²⁴ <https://www.reading.gov.uk/planning/planning-policy/>

Exemplar Local Plan Climate Change Policy Analysis – part b

	<p>including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.</p> <p>Cambridge Local Plan Policy 32²⁵ – Development will be permitted providing it is demonstrated that:</p> <ol style="list-style-type: none"> a. The peak run-off over the lifetime of the development, allowing for climate change, is no greater for the developed site than it was for the undeveloped site b. The post development volume of run-off, allowing for climate change, is no greater than it would have been for the undeveloped site. If this cannot be achieved then the limiting discharge is 2 litre/s/ha for all events up to the 100-year return period event. c. The development is designed so that the flooding of property in and adjacent to the development would not occur for a 1 in 100-year event, plus an allowance for climate change and in the event of local drainage failure d. The discharge locations have the capacity to receive all foul and surface water flows from the development, including discharge by infiltration, into water bodies and sewers e. There is a management and maintenance plan for the lifetime of the development, which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime f. The destination of the discharge obeys the following priority order; <ul style="list-style-type: none"> • Firstly, to ground via infiltration • Then, to a water body • Then, to a surface water sewer <p>Discharge to a foul water or combined sewer is unacceptable. Further text is provided for both a brownfield and greenfield site.</p>		
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²⁵ <https://www.cambridge.gov.uk/local-plan-2018>

Exemplar Local Plan Climate Change Policy Analysis – part b

<p>Water Resources Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan and should contribute towards their delivery where possible. Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals. Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and demonstrate that these would be protected throughout the construction and operational phases of development.</p>	<p>Reading Local Plan EN16 – Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it results in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or radiated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.</p> <p>Cambridge Local Plan Policy 31 – Development will be permitted providing that:</p> <ol style="list-style-type: none"> Surface water is managed close to its source and on the surface where reasonably practicable to do so Priority is given to the use of nature services Water is seen as a resource and is re-used where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development The features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make an active contribution to making places for people Surface water management features are multi-functional wherever possible in their land use Any flat roof is a green or brown roof, providing that it is acceptable in terms of its context in the historic environment of Cambridge and the structural capacity of the roof if it is a refurbishment. Green or brown roofs should be widely used in large-scale new communities There is no discharge from the developed site for rainfall depths up to 5mm of any rainfall event The run-off from all hard surfaces shall receive an appropriate level of treatment in accordance with Sustainable Drainage Systems guidelines, SuDS manual to minimise the risk of pollution 	<ul style="list-style-type: none"> Guidance in respect of run-off covered including volume and method of drainage. Reference to the Ciria SuDS manual. 	<ul style="list-style-type: none"> Surface Water Management Plan Strategic Flood Risk Assessment SuDS manual
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Exemplar Local Plan Climate Change Policy Analysis – part b			
	<ul style="list-style-type: none"> i. Development adjacent to a water body actively seeks to enhance the water body in terms of its hydromorphology, biodiversity potential and setting j. Watercourses are not culverted and any opportunity to remove culverts is taken k. All hard surfaces are permeable surfaces where reasonably practicable, and having regard to groundwater protection 		

Exemplar Local Plan Climate Change Policy Analysis			
Green/Blue Infrastructure			
WCS policy 52	Other LA policy	Differences/gaps	Evidence Used
<p>Green Infrastructure Development shall make provision for the retention and enhancement of Wiltshire’s green infrastructure network and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:</p> <ul style="list-style-type: none"> i. retain and enhance existing on-site green infrastructure ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development iv. provide 	<p>Camden Local Plan Policy A2 Open Space The Council will protect, enhance and improve access to Camden’s parks, open spaces and other green infrastructure. Protection of open spaces In order to protect the Council’s open spaces, we will:</p> <ul style="list-style-type: none"> a. Protect all designated public and private open spaces as shown on the policies Map and in the accompanying schedule unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area; b. Safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals, we will take the following into account: <ul style="list-style-type: none"> i. The effect of the proposed scheme on the size, siting and form of existing open space and the functions it performs; ii. Whether the open space is replaced by equivalent or better provision in terms of quantity and quality; and iii. Whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the opens space 	<ul style="list-style-type: none"> • Identifying areas of green/blue space to be protected and enhanced • Understanding how much green space a development should provide by using standards • Acknowledging how Green/Blue Infrastructure could support action on mitigating and adapting to climate change • Creating new recreational green/blue space in 	<ul style="list-style-type: none"> • Open Space Strategy • Open Space audit (carried out by the Open Space Strategy) • Open Space and Recreation Strategy • ‘All London Green Grid’ • Open Space, Sport and Recreation study

Exemplar Local Plan Climate Change Policy Analysis			
<p>appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy</p> <p>v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process. Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation. Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in</p>	<p>c. Resist development which would be detrimental to the setting of designated open spaces;</p> <p>d. Exceptionally, and where it meets a demonstrable need, support small-scale development which is associated with the use of the land as open space and contributes to its use and enjoyment of the public;</p> <p>e. Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;</p> <p>f. Conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets</p> <p>g. Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);</p> <p>h. Promote and encourage greater community participation in the management of open space and support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;</p> <p>i. Consider development for alternative sports and recreation provision, where the needs outweigh the loss and where this is supported by an up-to-date needs assessment;</p> <p>j. Preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath; and</p> <p>k. Work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the canal and its towpath.</p> <p>New and enhanced open space To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the borough's network of open spaces, the council will:</p> <p>l. Seek developer contributions for open space enhancements using Section 106 agreements or the Community Infrastructure Levy. The Council will secure planning obligations to address the additional impact of schemes on public open space taking into account the scale of the proposal, the number of future occupants and the land uses involved;</p>	<p>and adjacent to developments</p> <ul style="list-style-type: none"> Identifying the role of Green Infrastructure and natural drainage systems (e.g. reedbeds/wet woodland) can play in managing Phosphates in the River Avon 	

Exemplar Local Plan Climate Change Policy Analysis

<p>accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.</p>	<ul style="list-style-type: none"> m. Apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial and higher education developments while taking into account any funding for open spaces through the Community Infrastructure Levy; n. Give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision o. Ensure developments seek opportunities for providing private amenity space; p. Give priority to play facilities and the provision and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space; q. Seek opportunities to enhance links between open spaces recognising the multiple this may bring; r. Tackle deficiencies to open space through enhancement measures; and s. Seek temporary provision of open space where opportunities arise. <p>Cambridge Local Plan Policy 67: Protection of Open Space Development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of environmental and/or recreation importance unless:</p> <ul style="list-style-type: none"> a. The open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and b. The re-provision is located within a short walk (400 m) of the original site. <p>In the case of school, college and university grounds, development may be permitted where it meets a demonstrable educational need and does not adversely affect playing fields or other formal sports provision on the site. Where replacement open space is to be provided in an alternative location, the replacement site/facility must be fully available for use before the area of open space to be lost can be redeveloped.</p>		
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Exemplar Local Plan Climate Change Policy Analysis			
	<p>Cambridge Local Plan Policy 68: Open space and recreation provision through new development</p> <p>All residential development proposals should contribute to the provision of open space and recreation sites/facilities on-site. The successful integration of open space into a proposed development should be considered early in the design process. The precise type of on-site provision required will depend on the size and location of the proposal and the existing open space provision in the area. Where there are deficiencies in certain types of open space provision in the area surrounding a proposed development, the Council will seek variations in the component elements to be provided by the developer in order to provide the type of open space most needed. Requirements will be calculated using the OpenSpace and Recreation Standards and will have regard to the Council's adopted Open space and Recreation Strategy, Playing Pitch Strategy and Indoor Sports Facility Strategy.</p> <p>Alternative provision off-site of open space may be acceptable in the following circumstances:</p> <ol style="list-style-type: none"> a. If the proposed development site is of insufficient size in itself to make the appropriate provision feasible within the site; or, b. In exceptional circumstances, if taking into account the accessibility/capacity of existing open space sites/facilities and the circumstances of the surrounding area the open space needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site. <p>Where appropriate, and subject to the Regulations in force at the time, the Council will seek to enter into a Section 106 agreement with the developer to implement the above, and for the future management and maintenance of the open space provision, before granting planning permission.</p> <p>Reading Local Plan EN7: Local Green Space and Public Open Space <i>The Local Plan lists the LGS and POS that will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.</i></p>		

Exemplar Local Plan Climate Change Policy Analysis			
	<p>Reading Local Plan EN8: Undesignated Open Space</p> <p>There will be a presumption in favour of retention of undesignated open space, which will include allotments. Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space. Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land.</p> <p>Reading Local Plan EN9: Provision of open Space</p> <p>All new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities.</p> <p>On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children’s play areas and neighbourhood parks.</p> <p>A secure maintenance arrangement shall be demonstrated to ensure that any open space is properly maintained throughout the life of the development. In exceptional circumstances where the council agrees to the adoption of the open space, a commuted sum for future maintenance will be required as part of any legal agreement.</p> <p>On sites of less than 50 dwellings, or in areas not identified as deficient in the provision of open space, new open space provision, improvements or enhancements will be sought, including through appropriate contributions. The provision of open space for all developments shall satisfy the most urgent need subject to considerations of particular deficiencies. The most up-to-date Open Spaces Strategy should guide provision type and size. New open space should:</p> <ul style="list-style-type: none"> • Be in usable parcels of land and not be fragmented; • Be safely and easily accessible and not severed by any physical barrier, including a road; 		

Exemplar Local Plan Climate Change Policy Analysis			
	<ul style="list-style-type: none"> • Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm; • Create a safe environment, appropriately considering lighting and layout to reduce the fear of crime; • Provide some informal landscaping for aesthetic, wildlife and recreational purposes; and • Link into the Green Network where possible. <p>Reading Local Plan EN10: Access to Open Space In areas with relatively poor access to open space facilities (including as a result of severance lines), new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and /or facilitate the creation or linking of safe off-road routes to parks.</p>		

Exemplar Local Plan Climate Change Policy Analysis			
Sustainable Design and Construction in the Built Environment			
WCS policy 41	Other LA policy	Differences/gaps	Evidence Used
<p>Sustainable construction and low-carbon energy. Climate change adaptation New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the</p>	<p>Camden Local Plan Policy D1 Design The Council will seek to secure high quality design in development. The Council will require that development:</p> <ol style="list-style-type: none"> Respects local context and character; Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaption; Is of sustainable and durable construction and adaptable to different activities and land uses; Comprises details and materials that are of high quality and complement the local character; 	<ul style="list-style-type: none"> • Specific design standards to address the climate emergency. Potential to introduce a bespoke design standard for Wiltshire that addresses the loss of the Code for Sustainable Homes and goes beyond simply the energy 	<ul style="list-style-type: none"> • Reading's Climate Change Strategy responds to the needs of the Council and sets expectations for new development • BREEAM standards used to set benchmarks for energy efficiency in all new buildings

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<p>sun and use natural air movement for ventilation, whilst maximising cooling in the summer.</p> <p>Sustainable construction New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes.</p> <p>Conversions of property to residential use will not be permitted unless BREEAM's Homes "Very Good" standards are achieved⁸⁶.</p> <p>All non-residential development will be required to achieve the relevant BREEAM "Very Good" standards, rising to the relevant BREEAM "Excellent" standards from 2019.</p> <p>Existing buildings Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy:</p> <ol style="list-style-type: none"> i. Reduce energy consumption through energy efficiency measures ii. Use renewable or low-carbon energy from a local/district source iii. Use building-integrated renewable or low-carbon technologies. 	<ol style="list-style-type: none"> f. Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; g. Is inclusive and accessible for all; h. Promotes health; i. Is secure and designed to minimise crime and antisocial behaviour j. Responds to natural features and preserves gardens and other open space; k. Incorporates high quality landscape design and maximises opportunities for greening for example through planting of trees and other soft landscaping l. Incorporates outdoor amenity space; m. Preserves strategic and local views; n. For housing, provides a high standard of accommodation; and o. Carefully integrates building services equipment <p>The council will resist any development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.</p> <p>Cambridge Local Plan – Policy 28: Carbon reduction, community energy networks, sustainable design and construction, and water use</p> <p>All development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals. Promoters of major development, including redevelopment of existing floor space, should prepare a Sustainability Statement as part of the Design and Access Statement submitted with their planning application, outlining their approach to the following issues:</p> <ol style="list-style-type: none"> a. Adaption to climate change b. Carbon reduction c. Water management d. Site waste management e. Use of materials <p>In order to ensure that the growth of Cambridge supports the achievement of national carbon reduction targets, and does not exacerbate Cambridge's severe water stress, all new development will be required to meet the</p>	<p>standards within current Building Regulations.</p> <ul style="list-style-type: none"> • More specific guidance around retrofitting old and existing building to become more efficient/ be able to adapt to climate change • Incorporating efficient resource management – water, waste • Use of sustainable materials with an emphasis on utilising secondary/recycled construction materials in preference to virgin materials • Develop/foster a green construction industry in Wiltshire • Ensure all new development is supported by a 'Sustainability Statement' which outlines general principles that should be applied to all elements of development, covering areas such as climate change adaption, 	<ul style="list-style-type: none"> • A Sustainable Design and Construction Supplementary Planning Document (SPD) has been prepared to provide practical guidance on how to implement planning policies • Town and Country Planning Association's Climate Change Adaptation by Design: A Guide for Sustainable Communities (2007) has been used to set standards. • RECAP Waste Management Design Guide • Council's own guidance on household waste and recycling facilities in new developments • Building Research Establishment (BRE) Green Guide to Specification

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<p>Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement. Renewable and low-carbon energy All proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal. In all cases, including those listed above, proposals relating to historic buildings, listed buildings and buildings within conservation areas and world heritage sites should ensure that appropriate sensitive approaches and materials are used. Safeguarding of the significance of heritage assets should be in accordance with appropriate national policy and established best practice. In all cases the impact of these requirements on the viability of development will be taken into consideration.</p>	<p>following minimum standards of sustainable construction, carbon reduction and water efficiency, unless it can be demonstrated that such provision is not technically or economically viable: <i>See Local Plan</i> Where redevelopment/refurbishment of existing buildings is proposed, the development of bespoke assessment methodologies to assess the environmental impact of the proposals for submission with the planning application will be supported, subject to agreement of the scope of the alternative methodology with the council. Proposals that lead to levels of environmental performance equivalent to or higher than BREEAM will be supported. Where proposals relate to designated heritage assets, care will need to be taken to ensure that any proposals related to environmental performance are considered against the significance of the heritage asset and do not cause unacceptable harm to the asset’s significance. In order to promote the use of community energy networks, a strategic district heating area is shown on the Policies Map. Major development proposals within this area should where possible connect to existing heat networks under construction. This requirement will be relaxed if applicants can provide evidence that doing so would affect the viability of schemes. The Council will also be supportive of the future-proofing of developments so that they are capable of connecting to future heat networks.</p> <p>Reading Local Plan CC2: Sustainable Design and Construction</p> <p>Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layout use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. To meet these requirements:</p> <ul style="list-style-type: none"> • All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘excellent’ standards, where possible; • All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘very good’ standard as a minimum; 	<p>carbon reduction, water management, site waste management etc.</p> <ul style="list-style-type: none"> • Identify potential for community energy networks and consider allocating land in the Local Plan for strategic wind energy generation 	
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	<ul style="list-style-type: none"> All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost-effective. 		

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Sustainable Energy Generation and Management			
WCS policy 42 (also relates to CP 41 above)	Other LA policy	Differences/gaps	Evidence Used
<p>Standalone renewable energy installations</p> <p>Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site-specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:</p> <ol style="list-style-type: none"> The landscape, particularly in and around AONBs The Western Wiltshire Green Belt The New Forest National Park Biodiversity The historic environment including the Stonehenge and 	<p>Camden Local Plan Policy CC1: Climate change mitigation</p> <p>The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.</p> <p>We will:</p> <ol style="list-style-type: none"> Promote zero carbon development and require all development to reduce carbon emissions through following the steps in the energy hierarchy; Require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met Ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks; Support and encourage sensitive energy efficiency improvements to existing buildings; Require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and Expect all developments to optimise resource efficiency. <p>For decentralised energy networks, we will promote decentralised energy by:</p>	<ul style="list-style-type: none"> Identify the potential (feasibility/viability) for supporting community energy networks /decentralised energy networks Design standards for new building could include low carbon /renewable energy sources Collaboration with energy providers to better understand grid capacity and linkages Guidance on reducing energy demand and resource efficiency could be developed to 	<ul style="list-style-type: none"> 'Delivering a low carbon Camden' was relied upon as evidence. No such report available yet in Wiltshire Councils have developed tools such as 'Sustainability Plan' 'Green Action for Change' to help guide improvements in sustainable energy development Camden utilised 'Planning Guidance on Sustainability' to underpin their policies Assessment of Cambridge's potential for renewable and low

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Avebury World Heritage Site and its setting
 vi. Use of the local transport network
 vii. Residential amenity, including noise, odour, visual amenity and safety
 viii. Best and most versatile agricultural land.
 Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.

- g. Working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;
 - h. Protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King’s Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and
 - i. Requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

Cambridge Local Plan Policy 29: Renewable and low carbon energy generation

Proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts. As part of such proposals, the following should be demonstrated:

- a. That any adverse impacts on the environment, including local amenity and impacts on the historic environment and the setting of heritage assets, have been minimised as far as possible. These considerations will include air quality concerns, particularly where proposals fall within or close to the air quality management area(s) or areas where air pollution levels are approaching the WU limit values, as well as noise issues associated with certain renewable and low carbon technologies; and
- b. That where any localised adverse environmental effects remain, these are outweighed by the wider environmental, economic or social benefits of the scheme.

Note that this policy does not apply to applications for wind turbines, which would be considered against the requirements set out in the Local Planning Written Ministerial Statement, dated 18 June 2016.

Reading Local Plan CC4: Decentralised Energy

support new build and retrofit market

- Electric vehicle charging point strategy needed (LTP3) and will require working with the energy producing company and development industry.

carbon energy generation.

- Sustainable Design and construction SPD
- Feasibility study to identify potential opportunities for decentralised energy provision

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	<p>In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source. Any development of more than 20 dwellings and/or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. Where there is existing decentralised energy provision present within the vicinity of an application site, further developments of 10 dwellings or more or non-residential development of 1,000 sq m or more will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.</p>		

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Sustainable transport and Air Quality			
WCS policy 60, 61 and 55	Other LA policy	Differences/gaps	Evidence Used
<p>Sustainable transport The council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. This will be achieved by: i. Planning developments in accessible locations ii. promoting sustainable transport alternatives to the use of the private car</p>	<p>Camden Local Plan Policy T1: Prioritising walking, cycling and public transport The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. Walking In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments: a. Improve the pedestrian environment by supporting high quality public realm improvement works; b. Make improvements to the pedestrian environment including the provision of high-quality safe road crossings where needed, seating, signage and landscaping; c. Are easy and safe to walk through ('permeable') d. Are adequately lit;</p>	<ul style="list-style-type: none"> • Opportunity to link walking/cycling routes to GI improvement • Encourage cycling and walking as well as public transport where appropriate • Not just cycle paths but somewhere in towns to park bikes • Sustainable transport schemes • Infrastructure for electric vehicles needs to be scoped and 	<ul style="list-style-type: none"> • Local Transport Plan • Census (data on how people travel to work)

<p>iii. maintaining and selectively improving the local transport network in accordance with its functional importance and in partnership with other transport planning bodies, service providers and the business community</p> <p>iv. promoting appropriate demand management measures</p> <p>v. influencing the routing of freight within and through the county</p> <p>vi. assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment.</p> <p>Transport and new development</p> <p>New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. As part of a required transport assessment, the following must be demonstrated:</p> <p>i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:</p> <p>a. Visually impaired and other disabled people</p> <p>b. Pedestrians</p> <p>c. Cyclists</p> <p>d. Public transport</p> <p>e. Goods vehicles</p> <p>f. Powered two-wheelers</p> <p>g. Private cars.</p>	<p>e. Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and</p> <p>f. Contribute towards bridges and water crossings where appropriate.</p> <p>Cycling</p> <p>In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:</p> <p>g. Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;</p> <p>h. Provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;</p> <p>i. Makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;</p> <p>j. Is easy and safe to cycle through ('permeable'); and</p> <p>k. Contribute towards bridges and water crossings suitable for cycle use where appropriate.</p> <p>Public Transport</p> <p>In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate. Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.</p>	<p>considered in the context of viability.</p>	
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<p>ii. That the proposal is capable of being served by safe access to the highway network.</p> <p>iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.</p> <p>Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.</p>	<p>Camden Local Plan T3 Transport Infrastructure</p> <p>The Council will seek improvements to transport infrastructure in the borough. We will:</p> <ul style="list-style-type: none"> a. Not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and b. Protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport,. <p>Cambridge Local Plan Policy 80: Supporting sustainable access to development</p> <p>Development will be supported where it demonstrates that prioritising of access is by walking, cycling and public transport, and is accessible for all. This will be achieved by:</p> <ul style="list-style-type: none"> a. Ensuring major developments on the edge of the city and in the urban extensions are supported by high quality public transport linking them to Cambridge's city centre and major centres of employment. The public transport links should be within walking and cycling travel distance of the development; b. Supporting public transport, walking and cycling to, from and within a development by; <ul style="list-style-type: none"> 1. Giving priority to these modes where there is conflict with cars; 2. Conveniently linking the development with the surrounding walking, cycling and public transport networks; 3. Prioritising networks of public transport, pedestrian and cycle movement so these are the best and safest means of moving around Cambridge. Areas where public transport, pedestrian and cycle movement is difficult or dangerous will be improved and, where possible, have further capacity for these sustainable modes provided; 4. Ensuring accessibility for those with impaired mobility; and 5. Safeguarding existing and proposed routes for walking cycling and public transport, including the Chisholm Trail, from Development that would prejudice their continued use and/or development. In addition, funding for high quality physical provision of these routes will be required, both within and adjacent to the proposed developments. The proposed routes are identified in Cambridge and South Cambridgeshire. 		
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	<p>c. Ensuring that any development requiring a new road or road access accords with the following:</p> <ol style="list-style-type: none"> 6. It is designed to give high priority to the needs of pedestrians and cyclists, including their safety; 7. It restricts though access for general motor traffic where appropriate; 8. It discourages speeding 9. It discourages inappropriate car-based links within the network, but encourages non-car based links; 10. It minimises additional car traffic in the surrounding area; and 11. There is safe and appropriate access to the adjoining road, pedestrian and cycle networks. <p>Cambridge Local Plan Policy 81: Mitigating the transport impact of development</p> <p>Developments will only be permitted where they do not have an unacceptable transport impact. Therefore, new development will require:</p> <ol style="list-style-type: none"> a. Sufficient information to be supplied with all development proposals that are transport impact can be suitably addressed. This should take the form of transport assessments for schemes above the thresholds set in the latest Cambridgeshire County council guidance.; b. A travel plan to accompany all major development proposals; and c. Reasonable and proportionate financial contributions/mitigation measures where necessary to make the transport impact of the development acceptable. This could include investment in infrastructure, services or behavioural change measures to encourage the use of sustainable modes of transport. Such measures should be provided to meet the first or early occupation of a site in order to influence travel behaviour from the outset. <p>Reading Local Plan TR1: Achieving the transport strategy</p> <p>Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans.</p> <p>Planning permission will not be granted for major developments unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes</p>		
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	<p>to local facilities and services, including schools and parks, and similar measures.</p> <p>All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport for all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.</p>		
<p>Air quality Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:</p> <ol style="list-style-type: none"> i. landscaping, bunding or separation to increase distance from highways and junctions ii. possible traffic management or highway improvements to be agreed with the Local Authority iii. abatement technology and incorporating site layout/separation and other conditions in site planning iv. traffic routing, site management, site layout and phasing 	<p>Camden Local Plan Policy CC4: Air Quality The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. The council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan. Air quality Assessments (AQA's) are required where development is likely to expose residents to high levels of air pollution. Where the AWA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction management Plan.</p> <p>Cambridge Local Plan Policy 36: Air quality, odour and dust Development will be permitted where it can be demonstrated:</p> <ol style="list-style-type: none"> a. That it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air; or b. Where a development is a sensitive end-use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, sources of odour or other emissions to air. <p>According to the end-use and nature of the area and application, applicants must demonstrate that:</p>	<ul style="list-style-type: none"> • Identifying sensitive receptors to poor air quality e.g. schools, nurseries, care homes • Identifying sources other than vehicles e.g. smoke from industrial processes • A focus on particulates and health impacts associated with those particulates linked to cancer • Air quality monitoring, particularly within areas of recorded exceedance relied upon for setting air quality action plan targets/initiatives 	<ul style="list-style-type: none"> • Air Quality Action Plan • UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations • Local monitoring • We will need to move from annualised spot-collection data to time-series analysis to meet Defra standards • Any future policy will need to cover Particulate Matter 2.5 micron emissions (PM10).

<p>v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants.</p>	<p>a. There is no adverse effect on air quality in an air quality management area (AQMA);</p> <p>b. Pollution levels within the AQMA will not have a significant adverse effect on the proposed use/users;</p> <p>c. The development will not lead to the declaration of a new AQMA;</p> <p>d. The development will not interfere with the implementation of the current Air Quality Action Plan (AQAP);</p> <p>e. Any sources of emissions to air, odours and fugitive dusts generated by the development are adequately mitigated so as not to lead to loss of amenity for existing and future occupants and land users; and</p> <p>f. Any impacts on the proposed use from existing poor air quality, odour and emissions are appropriately monitored and mitigated by the developer.</p> <p>Reading Local Plan EN15: Air Quality Development should have regard to the need to improve air quality and reduce the effects of poor air quality.</p> <p>1. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:</p> <ul style="list-style-type: none"> • Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality; • Whether the development is within, or accessed via, an Air Quality Management Area; and • Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health, or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel. <p>2. Where a development would introduce sensitive users (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.</p> <p>3. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.</p>		
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