



Working towards a Core Strategy for Wiltshire

Topic paper 1: Climate change

Addendum
Wiltshire Core Strategy
Consultation January 2012

Climate Change Topic Paper: Addendum – Version 1

January 2012

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1. Executive summary

1.1

2. Introduction

- 2.1 This addendum provides an update to the Climate Change Topic Paper published in June 2011 to inform policy development for the emerging Wiltshire Core Strategy relating to climate change. The addendum should be read in conjunction with the topic paper. The sections within this addendum have been numbered consistently with the topic paper for ease of reference, but for some sections, no updates have been made. However, this approach will allow the addendum to continue be updated as the Wiltshire Core Strategy moves through the remaining stages of production towards adoption.
- 2.2 This addendum is designed to support the Submission Draft Wiltshire Core Strategy, January 2012. It will be updated through the remaining stages of producing the Wiltshire Core Strategy as appropriate.
- 2.3 As climate change is a highly cross cutting topic, reference should also be made to the other topic papers which inform policy development for the Wiltshire Core Strategy. Cross cutting matters are described by Appendix 1 within the Climate Change Topic Paper.

3. Policy and regulatory framework

3.1 Introduction

3.1.1 This section summarises any international, national, regional and local policies, strategies and regulations, relating to climate change, which have been published since June 2011 and are pertinent to policy development within the Wiltshire Core Strategy.

3.1.2 However, it is not intended to provide summaries for all recently published documentation relating to the topic, unless they outline particular changes which would affect the suggested policy approach set out in the Submission Draft Wiltshire Core Strategy, January 2012.

3.2 Reviews of relevant updated policies

Draft National Planning Policy Framework (2011)¹

3.2.1 This document was published for consultation in July 2011. Once the document is published in its final form, which is expected to be during April 2012, it is designed to replace the existing set of National Planning Policy Statements (PPS). Relevant PPS's to be replaced include: PPS 1 Delivering Sustainable Development; Planning and Climate Change Supplement to PPS 1; PPS 12 Local Development Frameworks; and PPS 22 Renewable Energy (and the associated companion guide).

3.2.2 The Draft National Planning Policy Framework (NPPF) makes it clear that climate change remains as a key government priority, for example stating that the planning system should:

- Secure, consistent with the Government's published objectives, radical reductions in greenhouse gas emissions, through the appropriate location and layout of new development, and active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure; and
- Minimise vulnerability and provide resilience to impacts arising from climate change.

3.2.3 Specific requirements for local planning authorities are stated in relation to supporting cuts in greenhouse gases and for supporting the delivery of renewable and low-carbon energy. Specific requirements include:

- Plan for new development in locations and ways which reduce greenhouse gas emissions;

¹ Communities and Local Government (2011). Draft National Planning Policy Framework.

- When setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards;
- Have a positive strategy to promote energy from renewable and low-carbon sources;
- Design policies to maximise renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; and
- Support community-led initiatives for renewable and low-carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

3.3.4 It is also stated that applicants for energy developments should not be required to demonstrate the overall need for renewable or low-carbon energy and also to recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

3.3.5 Until the NPPF is published in its final form the implications for policy development will be unclear. The existing relevant PPS's, including PPS 22: Renewable Energy and its companion guide, set out detailed guidance for Development Management staff which may need to be replicated with the Wiltshire Local Development Framework (LDF) if these PPS are replaced. Detailed guidance within PPS 22 includes, for example, detailed technical guidance relating to different renewable technologies including noise standards, or appropriate distances between wind turbines.

3.3.6 It is currently unclear if individual planning authorities will be required to develop guidance to replace the existing PPS's, nor what evidence would be required to justify such guidance.

**Statement by the Rt Hon Grant Shapps MP - Buildings and the Environment
17th May 2011²**

3.3.7 This statement clarifies the Government's approach to defining 'zero carbon' in relation to the previously published changes to Building Regulations that will require new residential development to be zero-carbon from 2016. This statement states that the definition will include regulated energy (for example from space heating, domestic hot water, lighting, fans and pumps), but will not include unregulated energy (for example from appliances and other electrical items).

3.3.8 The Government's commitment to zero carbon was reaffirmed along with the need to deliver carbon savings the Government is already committed to through published carbon budgets.

² Statement by the Rt Hon Grant Shapps MP – Buildings and the Environment 17th May 2011.

4. Evidence

4.1 Introduction

4.1.1 This section updates any relevant evidence following publication of the Climate Change Topic Paper in the following three areas:

- 4.2 – Summary of previous consultation responses
- 4.3 – Evidence relating to climate change adaptation
- 4.4 – Evidence relating to climate change mitigation

4.2 Summary of previous consultation responses

4.2.1 The Climate Change Topic Paper was published alongside the Wiltshire Core Strategy Consultation Document in June 2011. A brief summary of the consultation responses relating to the climate change policies is set out below. A more detailed report into the consultation responses is available on the council website.

4.2.2 Changes have been made to the Submission Draft Wiltshire Core Strategy to reflect some of the consultation comments.

4.2.3 Sixty one comments were received on this topic overall and they fall into the following main topic areas: landscape; design; viability; water; transport; large scale renewables, waste and general climate change comments.

4.2.4 The comments were quite varied and ranged from strong support for the proposed policies through to a suggestion that the Climate Change Act should be deleted. A number of respondents suggested that the policies did not go far enough and others suggested that it went too far. Many respondents took the opportunity to make general comments on climate change more generally and many also commented on transport which is covered elsewhere in the Wiltshire Core Strategy.

4.2.5 It was highlighted that the Government's definition for zero-carbon has changed and this has been reflected both in this addendum and the revised policies. Some respondents very helpfully provided suggested amendments to the policy wording which have largely been utilised to help improve the clarity of the policy. Internal comments received, in particular from Development Management Officers, have also been incorporated to improve policy wording and clarity

4.2.6 A number of responses suggested that it was inappropriate for the core strategy policy relating to standalone renewable energy to suggest that applicants will not be required to justify the overall need for renewable energy development, either in a national or local context. However, this matter is consistent with national policy and is outlined in the Draft NPPF (see Section 3.2). Although it is not necessary to repeat national policy within a core strategy, the very poor performance in Wiltshire to deliver renewable energy (set out elsewhere in this addendum and in the topic paper), justifies a clear and positive statement within the Wiltshire policy.

- 4.2.7 One particular area identified by the consultation comments was the suggestion that the proposed policies both duplicated national policies and also went beyond national policy by setting higher targets. These comments related to both the Code for Sustainable Homes and also zero-carbon targets for new development. It is considered that neither of these assertions is correct for the reasons described below.

Code for Sustainable Homes

- 4.2.8 The Code for Sustainable Homes relates to nine categories and is voluntary and there are no published proposals from the Government to make them mandatory. The energy performance of buildings will improve through Buildings Regulations (move towards zero-carbon development by 2016) and this essentially fulfils the energy component of the Code for Sustainable Homes (but not the other eight categories).
- 4.2.9 There is a clear need to improve the way climate change is addressed in Wiltshire and to make new development more sustainable. By proposing to introduce the 'full' Code for Sustainable Homes targets in Wiltshire for new development, in line with the timetable for changes to Building Regulations for improving energy performance, this clearly therefore does not duplicate national policy. A financial viability study has been undertaken for Wiltshire which confirms that this policy does not negatively affect the viability of development and therefore ensures it complies with the requirements of national policy.

Zero-carbon Development

- 4.2.10 No targets for zero-carbon have been proposed by the Wiltshire Core Strategy. It is proposed that a Sustainable Energy Strategy is completed for 'major' development which demonstrates the carbon strategy for the development. This is highly consistent with national policy and seeks to ensure that opportunities to reduce carbon emissions and deliver renewable energy are delivered through new development. It is suggested that residential developments of over 500 units would 'be expected' to be zero-carbon from 2013, although if this is not the case, the evidence demonstrating why these standards cannot be met can be set out in the Sustainable Energy Strategy. In this way, no minimum targets are being imposed and the policy is flexible, allowing site specific factors to be taken into account and ensuring that where it is not viable to meet zero-carbon standards that developers will not be required to meet these standards.
- 4.2.11 Overall, this policy is based on clear Wiltshire evidence for the need to increase the delivery of renewable energy in the county and ensure that new development adds minimally to the carbon footprint of the county prior to 2016. By seeking to maximise opportunities to deliver renewable energy and reduce carbon emissions the policy is consistent with national policy and also provides for flexibility by ensuring that site specific factors are considered along with viability.

4.2.12 Amendments to the Submission Draft Wiltshire Core Strategy include the proposal that off-site provision of renewable energy will be considered acceptable, to count towards the definition of zero-carbon, in the period up to 2016. This provides for additional flexibility and ensures that opportunities to deliver renewable energy in Wiltshire can be maximised. The council also proposes to develop Wiltshire specific allowable solutions to be in place by 2016.

4.3 Evidence relating to climate change adaptation

4.3.1 No updates made to this section.

4.4 Evidence relating to climate change mitigation

Introduction

4.4.1 This section provides an update to the Climate Change Topic Paper where either evidence has changed or needs updating or where changes to national policy need to be reflected in the policy approach taken in Wiltshire.

Wiltshire carbon emissions

4.4.2 The Climate Change Topic Paper presented carbon emissions data for Wiltshire updated to 2007. This indicated that the per capita emissions for Wiltshire were greater than for the South West or the UK and were continuing to rise, whereas for the South West overall they were going down.

4.4.3 As 2008 data is now available this analysis needs updating. The 2008 data reveals that the per capita carbon emissions for Wiltshire are still greater than for the South West or the UK overall. Although a slight reduction in emissions was recorded in Wiltshire of 0.5 %, the emissions for the South West went down overall by 5 % and for the UK by 4 %³.

4.4.4 It should be noted that even the slight reduction in emissions reported in Wiltshire above should not necessarily be taken to indicate a positive trend. It has been reported elsewhere that the reduction in carbon emissions experienced across the UK in recent years has been largely attributed to an economic downturn rather than successful climate change mitigation⁴.

³ (2011) Wiltshire Energy and Emissions Digest 2005 to 2008 – unpublished report.

⁴ Committee on Climate Change (2010). Meeting carbon budgets – ensuring a low carbon recovery. Second progress report to parliament – June 2010

Existing renewable energy and heat installations in Wiltshire

- 4.4.5 In January 2010 the installed capacity of renewable energy for Wiltshire and Swindon was 15.30 MW, as set out in the topic paper. This data can be updated and the most recent available data is from January 2011 (a revised review will be published in June 2012). The installed capacity of renewable energy for Wiltshire and Swindon for January 2011 was 18.20 MW. However, the majority of this rise can be accounted for by additional renewable energy installations in the administrative area of Swindon Borough Council. The rise in the Wiltshire Council area for this period was for less than 1 MW in total.
- 4.4.6 The rise in renewable heat installed in Wiltshire since January 2010 is greater than for energy and the total for Wiltshire and Swindon in January 2011 is 5.48 MW (2.69 MW in January 2010). However, despite this rise, Wiltshire remains as the worst performing area for renewable heat in the South West.
- 4.4.7 It is clear that progress to deliver renewable energy in Wiltshire is inadequate to meet current UK government targets of at least 15 % of energy to be derived from renewables by 2020⁵. The Climate Change Topic Paper sets out scenarios for how this target could be achieved and demonstrates that around 367 MW of renewable electricity would need to be installed to meet this target. At the current rate of delivery this would take several hundred years to achieve.

Table 4.1: Installed renewable electricity capacity (MW) in Wiltshire and Swindon in January 2011, by administrative area, and technology type⁶.

Authority	Advanced Treatment of Waste	Hydro	Landfill Gas	Onshore Wind	Sewage Gas	Solar PV	Area Total
Swindon	0	0	6.444	0.008	0.450	0.216	7.118
Wiltshire	0	0.115	10.020	0.014	0.170	0.786	11.105
Total	0	0.115	16.464	0.022	0.620	1.003	18.223

⁵ UK Renewable Energy Strategy (2009).

⁶ Regen SW, 2011. Renewable electricity and heat projects in South West England.

Table 4.2: Installed renewable heat capacity (MW) in Wiltshire and Swindon in January 2011, by administrative area, and technology type⁷.

Authority	Advanced Treatment of Waste	Biomass	Heat Pumps	Sewage Gas	Solar Thermal	Area Total
Swindon	0	1.325	0.018	0	0.071	1.414
Wiltshire	0	2.626	0.713	0.200	0.529	4.067
Total	0	3.951	0.730	0.200	0.600	5.481

Area specific carbon standards for new development

4.4.8 The Climate Change Topic Paper outlines the Governments intentions to ensure new residential development is 'zero-carbon' from 2016 through changes to Building Regulations. The Government have now published their approach for defining 'zero-carbon' (Section 2), which states that regulated, but not unregulated emissions, should be included with the definition. Excluding unregulated emissions from the definition for zero-carbon reduces the financial burden on developers and makes the target overall more achievable.

4.4.9 It is still intended that zero-carbon standards will be delivered by following the energy hierarchy: energy efficiency first, followed by carbon compliance (on site measures); and finally allowable solutions. The term 'allowable solutions' means allowing some carbon reduction to be achieved 'off-site', such as the provision of renewable energy, but that this still counts towards the carbon budget of the new development itself. However, the balance for how much of the total carbon reduction can come from each of these three components has not been finalised by the Government and consultation into the use of allowable solutions is ongoing.

4.4.10 To ensure opportunities to reduce carbon emissions from new development are maximised the topic paper proposed that a Sustainable Energy Strategy would be required for large scale⁸ development outlining how the Governments carbon targets would be met. For residential schemes greater than 500 dwellings, it would be necessary to demonstrate why zero-carbon standards were not to be met from 2013, if this was regarded as not being viable.

4.4.11 This approach is considered to be highly compatible with the Draft NPPF (Section 2) as it is highly consistent with the Government's zero-carbon buildings policy. A Sustainable Energy Strategy is required to ensure the carbon strategy maximises opportunities to deliver low-carbon and renewable technologies. Although residential schemes of over 500 units would be expected to achieve zero-carbon standards from

⁷ Regen SW, 2011. Renewable electricity and heat projects in South West England.

⁸ 'Large scale' has since been defined as 'major' development in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2010.

2013 (in advance of the national timetable) – flexibility is provided, as the Sustainable Energy Strategy can be used to demonstrate where meeting such a standard would not be viable.

- 4.4.12 It is proposed that Wiltshire Council will support flexible mechanisms, such as allowable solutions, in line with the definition to be published by central government. However, due to the low level of renewable provision in Wiltshire and the need for strategic growth in the period up to 2016 to add minimally to the carbon footprint of the county, the council will support off-site provision of renewable energy to contribute towards meeting zero-carbon standards. This would be subject to demonstration through the Sustainable Energy Strategy that the renewable energy provision is equivalent to the amount that would be needed to deliver carbon neutral development on-site.
- 4.4.13 It is also proposed that Wiltshire Council will develop Wiltshire specific allowable solutions, to be in place by 2016, which will be published in a future planning policy document.

Sustainable Construction

- 4.4.14 The Submission Draft Wiltshire Core Strategy proposes to introduce sustainable construction targets, where 'full' Code for Sustainable Homes targets are met for all nine categories of the code, but in line with proposed changes to Building Regulations (Code 4 from 2014 and Code 5 from 2016).
- 4.4.15 A viability assessment has been prepared for Wiltshire Council to inform the Submission Draft Wiltshire Core Strategy. This report included consideration for introducing Code for Sustainable Homes targets, as described above, and found that for all of the strategic sites proposed by the Submission Draft, the sites were still viable⁹. The study concludes that the proposed sustainable construction targets do not negatively affect the viability of the proposed strategic sites and is therefore considered to be acceptable.

⁹ Adams Integra (2012) Wiltshire Affordable Housing Viability Assessment

5. Identifying priorities at a community level

5.1 No updates made to this section.

6. Challenges and opportunities

6.1 Introduction

- 6.1.1 This section should be read in conjunction with the Climate Change Topic Paper and briefly summaries any key issues which may have implications for policy development.

Policy and regulatory framework

- The Draft NPPF proposes a positive policy framework to help meet Government targets for radical reductions in greenhouse gas emissions and minimise vulnerability and provide resilience to impacts arising from climate change. However, as the NPPF will replace the existing PPS's including PPS 22: Renewable Energy, it is possible that additional policies may need to be published by Local Planning Authorities to replace the detail currently provided by the PPS's. This matter will need to be reviewed once the NPPF has been published in its final form.
- The Government have published their definition for zero-carbon. This will include regulated, but not unregulated emissions.

Evidence

Consultation responses

- A range of responses were received to the Wiltshire Core Strategy Consultation Document June 2011. A number of minor amendments have been made to the relevant policies to reflect the responses, particularly to improve the clarity of the policy. Overall, it is felt that significant change was unnecessary and that the policy approach is highly consistent with national policy.

Climate Change adaptation

- No updates made to this section.

Climate change mitigation

- 2008 carbon data reveals a reduction in emissions of 0.5 % in Wiltshire, in comparison to a 5 % reduction across the South West overall, and a 4 % reduction for the UK. It has also been reported that reductions in emissions in this period were a product of economic downturn rather than positive climate change mitigation.
- The level of installed renewable energy in Wiltshire went up from 15.30 MW in January 2010 to 18.20 MW in January 2011. Most of this increase was attributed to renewables installations in Swindon Borough Council area and the rise in Wiltshire Council area was by less than 1 MW. At this rate of delivery, it would

take several hundred years to meet UK Government targets of 15 % of energy to be derived from renewables by 2020.

- Given the very low level of renewable energy provision within Wiltshire, it is suggested that Wiltshire Council should support off-site provision of renewables to count towards meeting zero-carbon standards up to 2016.
- An assessment of viability concludes that the proposed Code for Sustainable Homes targets would not negatively affect viability of the proposed strategic housing sites set out in the Submission Draft Wiltshire Core Strategy.

Community priorities

- No updates made to this section.

7. Policy Options

- 7.1 The updates outlined in this addendum do not justify any amendments to the policy options set out in the Climate Change Topic Paper. Overall, it is considered that the updated evidence supports the policy approach proposed in the Pre-Submission Draft Wiltshire Core Strategy.

8. Conclusions

8.1.1 This addendum provides an update to the Climate Change Topic Paper, published in June 2011. It should be read in conjunction with the full topic paper. Updates are provided which relate to any recently published and relevant policy documents, the responses received to the Wiltshire Core Strategy Consultation Document June 2011, and any updates to the evidence base.

8.1.2 Section 6 of this addendum provides a summary of any key issues identified. Overall, it is concluded that apart from amendments to the proposed policy, set out in the Submission Draft Wiltshire Core Strategy to improve clarity, that no fundamental changes are required. It is suggested that the proposed policies are highly consistent with national planning policy, which seek to:

- Ensure that new development adds minimally to the carbon emissions of the county;
- That opportunities for delivering renewable energy are maximised; and
- That a positive policy framework is in place to provide support for an increase in renewable energy development in Wiltshire.

9. References

Adams Integra (2012) Wiltshire Affordable Housing Viability Assessment

Committee on Climate Change (2010). Meeting carbon budgets – ensuring a low carbon recovery. Second progress report to parliament – June 2010

Communities and Local Government (2011). Draft National Planning Policy Framework.

Regen SW (2011). Renewable electricity and heat projects in South West England.

Statement by the Rt Hon Grant Shapps MP – Buildings and the Environment 17th May 2011.

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