

From: [Rhodes, Ann](#)
To: [Strategy](#)
Cc: [Bryant, Nick](#)
Subject: FW: Local Plan Options response & next step - Land Availability Assessment
Date: 13 March 2020 12:46:08
Attachments: [image001.jpg](#)

Hi All

Reps forwarded to strategy box

Kind Regards

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Planning Magazine Awards 2018: Short Listed for Promoting Economic Growth with the Nexus 25 Taunton LDO.

Planning Awards 2017: High Commendation for Local Authority Planning Team of the Year.



From: Phil Cookson [REDACTED]
Sent: 13 March 2020 12:34
To: janet lloyd [REDACTED]; Michael McGuffie [REDACTED]; marklithgow@wellingtontowncouncil.co.uk; Andrew Govier - Councillor <AJGovier@somerset.gov.uk>; kathryn@wellingtontowncouncil.co.uk
Cc: Rhodes, Ann <A.Rhodes@somersetwestandtaunton.gov.uk>; Bryant, Nick <N.Bryant@somersetwestandtaunton.gov.uk>; Downes, Robert <R.Downes@somersetwestandtaunton.gov.uk>; Anita Roy [REDACTED]; Helen Gillingham [REDACTED]; Kate Holloway [REDACTED]; Andrea Rickard [REDACTED]
Subject: Local Plan Options response & next step - Land Availability Assessment

Hello folks,

Further to our recent deliberations, I attach my professional response to Theme 1 - Low Carbon Developments.

@ Rob & Nick: please kindly ensure this document is included in the Issue & Options

Consultation feedback by forwarding to whichever colleague is collating responses.

I also attach the Dorset Council document explaining about the Land Availability Assessment they are just finalising and a Site Submission template. These documents will help you understand more about the next step of the SWT Local Development Strategy, which will start later this Spring.

As always, I'm happy to meet and / or discuss to work out ways of bringing land forward for our low carbon futures.

with best regards

Phil
07966 349670

Consultation Responses
To Somerset West and Taunton Council
Regarding Local Plan 2040 Issues and Options Document
By
Phil Cookson BSc (Hons) MSc DipFA

OPENING CONTEXT:

To show leadership, SWT Councillors could adopt the policy formulation procedures recommended in the June 2019 Association of Directors of Environment, Economy, Planning & Transport [Good Practice Guide “Preparing for a Changing Climate”](#).

Note the Bradford City Council [Climate Emergency and Green Economy](#) policy.

Question 1a: Achieving carbon reduction from new development

“Should we aim to require that all new development is ‘zero carbon’ [potentially allowing for carbon offsetting in certain circumstances] by as soon as possible (e.g by 2025) or give slightly more time (e.g. by 2030) for developers to adapt their design approached, materials and suppliers?”

SWT should adopt Core Strategy policies worded sufficiently specific that it enables a robust Supplementary Planning Guidance to mandate that developers will only achieve Planning consents and Building Regulations permissions for designs (in all sectors, residential homes & flats, commercial, industrial, leisure, and so on *and* civil engineering projects) that meet the certified standards developed by the Building Research Establishment (BRE); the SPG should specify, amongst other targets/thresholds, that:

- residential consents and permissions will only be granted for designs that meet the minimum standards of the [Home Quality Mark](#) ONE certificate after 1st January 2022;
- commercial consents and permissions will only be granted for designs that meet the minimum standards of [BREEAM](#) Excellent after 1st January 2022 and [BREEAM](#) Outstanding after 1st January 2023
- civil engineering consents and permissions will only be granted for designs that meet the minimum standards of [CEEQUAL Version 6](#) after 1st January 2022.

Any ‘offsetting’ criteria should be limited to carbon sequestration projects that are certified by internationally recognised schemes.

Question 1b: “**Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?**”

Allocate specific sites; Planning Inspector Griffith’s November 2016 Review of the Allocated Sites of the previous TD Local Plan commented that searching for specific renewable energy installation sites could be very time consuming ([Page 11, Issue 6, para 57](#)).

Given the SWT Climate Emergency declaration and Carbon Neutral 2030 policy, SWT must now commission WPD to provide half-hourly power demand loads at substations; and similarly, commission a study to identify the capacity to [supply biomethane into the gas grid](#); and share the results of these studies with the local NFU and CLA chairpersons so as to recruit landowners to allocate sites adjacent to electricity substations and gas grid connection locations.

Thereafter negotiations with the Environment Agency Rivers Teams, Somerset Waste Partnership and building landlords to access roof spaces, riverbanks and land for the appropriate solar, hydro and anaerobic digestion renewable installations to supply the required power and gas.

Supplementary Planning Guidance should both mandate a ***presumption in favour*** of granting Planning consent for renewable power and heat installations AND, to expedite the necessary large amount of installations, state thresholds and provide acceptable Method Statements for archaeological magnetometry surveys and landscape and visual impact assessments.

Supplementary Planning Guidance should mandate that all unrestricted open ground on commercial developments (such as car, van and lorry parks) are built with elevated solar farms and wind turbines with battery storage for electric vehicle charging.

As part of the SWT strategic energy policy priorities, together with SCC, should declare a policy to negotiate with the MOD and RNAS Yeovilton to install, by 2030, a [dual Terma SCANTER 4002 radar system](#) which is capable of supporting air traffic control requirements and mitigating the impact of wind turbines on radar.

Question 1c: Comment on 7 additional policy approaches

1c/1 Yes, introduce a policy mandating developers to demonstrate their proposed projects' impacts upon achieving the Carbon Neutral 2030 district.

1c/2 Yes, require sustainable, adaptable and resilient designs, including electric vehicle charging in all new residential parking spaces

1c/3 Yes, encourage and enable the sustainable retrofit of existing buildings and communities

In November 2017, the RICS released their "[Whole life cycle carbon assessment for the Built Environment](#)" Professional Statement which requires surveyors to obey the mandates "must" and follow the best practice advice "should" of that statement.

The EN 15978 Standard (BRE Global Methodology for The Environmental Assessment of Buildings) was [updated in January 2018](#).

In April 2019, the UK Green Building Council launched a [framework definition for net zero carbon buildings](#) to provide the industry with clarity on how to achieve net zero carbon in construction and operation, which was [welcomed by the Chair of the RIBA Sustainable Futures Group](#)

The Royal Institute of British Architects (RIBA) will soon publish, and [is, throughout 2020, training architects](#), the RIBA Plan of Work 2020 which will require a Sustainability Coordinator, and a new guide on Sustainable Outcomes. The 2019 Plan of Work materials started to support RIBA members and practices to develop and deliver clear, measurable and realistic goals that ensure their projects meet the 2030 Climate Challenge targets.

1c/4 Yes, "support community decentralised renewable energy schemes and micro-generation" - provide long term, low interest finance to support the cash-flow of such local community renewable energy organisations?, such as Brendon Energy.

1c/5 Yes, set criteria to require developers to protect the Grade 1 and Grade 2 land and require mitigation from the loss of productive use of this land from their developments; for example, by providing finance for local food production businesses as part of their planning consents (Community Infrastructure Levy).