Submission on behalf of Prologis and Stoford Developments
Solihull LPR Draft Submission Plan
December 2020

Policy P9 – Mitigating and Adapting to Climate Change

Q5. General comment

1. As landowners and developers of land within Site UK2 we fully support the Councils recognition that the plan has a crucial role to play in securing mitigation against and adapting to climate change. Both development partners have a longstanding and enduring commitment to sustainability that sits at the heart of everything they do. Accordingly, we are fully in support of the aims and objectives of Policy P9 and the general requirement that proposals for major development be accompanied by a Climate Change Assessment as set out under Paragraph 7 of the Policy.

2. However, with regard to the site level policy requirements within paragraph 3 of the Policy we feel that some of the requirements specified should be less specific in order to ensure a holistic approach to sustainable design is taken. Specifically we raise concern with a mandatory BREEAM Excellent accreditation and a 15% renewable/low carbon energy source requirement. These measures have their place in a basket of tools to address climate change but blanket requirements like this do not necessarily secure best outcomes. It also has to be recognised that securing BREEAM Excellent on green field sites can be extremely difficult under the new 2018 BREEAM standards. There are many other tools that can be just as effective in reducing carbon emissions and every development is different in this regard. The overall approach can be set out in the required Climate Change Assessment already contained in the policy.

3. As site promoters of UK2 for example we would approach building design to minimise operational carbon emissions based on a three-step approach:

    - Step 1 - Passive Design Measures. These would include:

        i. high levels of air-tightness and insulation to reduce potential heat loss. Through cladding specification and detailing insulation levels can be achieved that are well in excess of Building Regulations, and air-pressure tests show that we can achieve air-tightness levels up to 80% better than the statutory requirement.

        ii. rooflights to cover 15% of the warehouse roof area in order to maximise the use of daylight, while optimal orientation takes into account the path of the sun and the prevailing winds.

        iii. Where possible offices are designed on a narrow floorplate with dual aspect glazing to take advantage of natural daylight and allow for effective passive ventilation.

        iv. Provision of solar shading to ensure thermal comfort and avoid solar gain.

- Step 2 – Efficient Systems. Where energy use is required this can be specified and installed using the most energy efficient plant systems available. This can include intelligent lighting with low-energy LED fittings, daylight linking and presence-detecting controls. High-efficiency, low-NOX boilers with thermostatically controlled radiators to provide heating to offices, and the sub-metering of buildings to help users track and manage their energy consumption.

- Step 3 – Low or Zero Carbon Technologies. Once the operational energy use in the building has been minimised we then design and install low-or zero-carbon technologies to meet customer's specific operational needs and, as a result, further reduce operational carbon emissions.

4. In addition to the above, we can undertake 'cradle to grave' Carbon Life Cycle Assessments based on the requirements of BS EN 15978. The results of these assessments show the significance of the embodied carbon emissions associated with the construction process which typically accounts for as much as 70% of lifetime carbon emissions of a warehouse, based on a 30-year assessment period. In this way we can therefore reduce embodied emissions through efficient design, the use of low carbon materials and the focused reduction of construction waste including diverting waste from landfill.

5. As can be seen, we would suggest that a more bespoke approach is taken to consider each site on its merits through the requirement to provide a bespoke Climate Change Assessment.

6. With regard to where BREEAM is adopted as a measure, the policy should be clear as regard to which BREEAM standard it relates to (i.e. BREEAM new Construction 2018' standard) and that these should be referenced as targets given there is no way to guarantee the outcome of an assessment

7. We would also note that it is not realistic to expect minor development to undertake BREEAM Assessments

Q6. Specific Modifications Requested

The following specific changes to the Draft Submission Plan are requested in response to the issues above. Local Plan text is shown in italics. Requested additions are shown in bold, and requested deletions in strike through:

Policy P9 Paragraph 3, criterion iii and iv. should be replaced with the following text:

"iii ~~*Minor non-residential development will conform to at least BREEAM Very Good*~~ *Major non-residential development* ***should target*** ~~*will conform to*~~ *at least BREEAM Excellent* ***wherever possible using 2018 BREEAM Construction Standard. The approach to achieving this should be set out in the Climate Change Assessment required under paragraph 9.***

iv ~~*Provide*~~ ***Target*** *at least 15% of energy* ***where possible*** *from renewable and/or low carbon sources for all major housing developments and non-residential developments of 1,000 sq.m of more".*