

Turning to the policy requirements regarding Policy JP-S2: Carbon and Energy.

The guidance appears to focus specifically on energy and carbon in buildings. On page 3, under “Who this guidance is aimed at,” it states that the document relates to planning submission requirements connected to energy and carbon in buildings.

Whilst I understand the view that this is being treated as a change of use application, energy statements in that context generally relate to buildings and internal floorspace. In this case, the proposal:

1. Does not involve a building;
2. Has no operational energy demand;
3. Does not trigger Part L of the Building Regulations; and
4. Would not generate regulated carbon emissions.

Given this, it is not possible to complete the standard energy calculation proformas for the scheme.

Similarly, in relation to Policy JP-C2: Digital Connectivity, the policy relates to new development intended for occupation and requiring digital infrastructure provision. As the proposal does not comprise a building and is not intended to be occupied, it is not clear how the policy would apply in this instance.

More generally, Article 7(3) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out that additional information requested for validation should be reasonable, having regard to the nature and scale of the proposed development. National Planning Practice Guidance also advises that information sought should be necessary, relevant and proportionate.

Given the nature of the proposal, I'd request that the application is validated without the submission of an Energy Statement or Digital Connectivity Statement.