

Sustainable Low-carbon Buildings Supplementary Planning Document Statement of Consultation

Contents

	Page:
1. Introduction	2
2. Summary of Issues Raised, the Council's Response and how the issues have been addressed in the adopted SPD	2
Appendix 1 – Lists of Individuals, Agents and Organisations Contacted during the Consultation Exercise.	5
Appendix 2 - Schedule of Representations Received and the Council's Response	16

1 INTRODUCTION

- 1.1 The draft Supplementary Planning Document (SPD) entitled 'Achieving Sustainable Low-carbon Buildings' was published for public consultation in early July 2007. Comments on the draft SPD were invited during the consultation period commencing on Thursday 5th July and concluding on Thursday 16th August.
- 1.2 The draft version was prepared with input from District Council officers and councillors on the Environmental Sustainability Panel, Warwickshire County Council officers, Local Agenda 21 and Local Strategic Partnership Environment members together with other key council officers. The Planning Portfolio-holder approved the draft document as the basis for public consultation.
- 1.3 The Draft SPD and the Sustainability Appraisal of the SPD were made available for public inspection at the Council's main and area offices and also at all libraries within the District. A statement of SPD matters was published in 2 local newspapers on Thursday 5th July.
- 1.4 The draft SPD, the Sustainability Appraisal, and the statement of SPD matters were published on the Council's web site.
- 1.5 Letters were sent to over 1000 consultees on the Council's community consultation database inviting comments on the draft SPD. A full list of consultees is attached as Appendix 1.

2 SUMMARY OF ISSUES RAISED, THE COUNCIL'S RESPONSE AND HOW THE ISSUES HAVE BEEN ADDRESSED IN THE ADOPTED SPD

- 2.1 During the consultation period responses were received from 26 separate organisations and individuals. A comprehensive schedule summarising the representations received together with the Council's response is attached to this report as Appendix 2. A summary of the key issues raised is provided below.
- 2.2 Representations were received from 13 public organisations and seven private developers. All public sector responses and the Local Strategic Partnership Environment Group were supportive of the SPD's approach and encouraged a requirement for on-site renewable energy on the lowest possible size of development. However, while several private developers supported the general approach of the SPD and a requirement for on-site renewable energy, several objected to the principles of the SPD, and stated that on-site renewable energy should be encouraged rather than required. Some developers also objected to requirements for information on sustainable urban drainage and intended energy performance.
- 2.3 Many helpful comments were received from all parties regarding procedural and technical issues.
- 2.4 An issue which received particular attention in responses was the threshold at which renewable energy measures will be required. All public sector bodies were very supportive of the draft's suggestion to require renewable energy from development of 100m² non-residential or one dwelling. All private developers objected to this and argued for a higher threshold of 1000m² or ten dwellings. Internal discussions with Planning

Development suggested that a very low threshold may present difficulties for their implementation.

- 2.5 The draft SPD was designed to follow closely national guidance and requirements set out in the drafts 'Building a Greener Future: Towards zero carbon development' and 'Planning Policy Statement: Climate Change and Planning, supplement to PPS1' both of which were published by Communities and Local Government for consultation in early 2007. Many of the objections received referred to older published guidance to support their case.
- 2.6 A report on the responses received with suggested responses, including proposed changes to the SPD, was prepared to inform the Council's Executive in their decision making. This report acknowledged that the CLG consultation documents have not yet been confirmed but advised that they can be considered as the latest statement of government intent, particularly as the draft Climate Change PPS states that local authorities will need to take account of the draft document in their policies, and that its advice should take precedence where there is differing emphasis. The report also suggested that the threshold above which renewable energy is required should be raised to 5 dwellings or 250m² non-domestic to aid implementation by the Planning Services.
- 2.7 The representations received and a suggested Council's response was considered by the Council's Executive at the meeting on 1st October 2007. The response to the representations which was discussed and agreed by the Executive is set out in Appendix 2. In particular it was considered by the Executive that the threshold for renewable energy should remain at 100m² or 1 dwelling as tested in the draft SPD, as this option was clearly identified as most sustainable through the Sustainability Appraisal.
- 2.8 In the light of the representations received the Executive recommended that the SPD be adopted but with the following key changes:

Clarify description of threshold above which development will be required to incorporate on-site renewable energy to replace 10% of predicted CO₂ emissions to read "All applications for development (new build, significant re-build, and conversion from agricultural to commercial or residential) of over 100m² non-residential floor area or 1 or more dwellings".

Clarify that all planning applications which create a floor area will be required to demonstrate how they have taken energy efficiency and sustainable urban drainage into account.

Include questions within the checklist requiring applicants to consider the issues of low-energy materials, waste management and adaptable design.

Modify procedural sections to require realistic levels of scheme detail for outline planning permissions and at submission stage.

Make changes to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations and emphasise issues including cooling, and to the section on types of renewable energy to highlight design and conservation issues.

Alter wording of requirement for larger developments to explain how they have considered Building Regulations and decentralised

energy systems to exactly follow wording within draft PPS Planning and Climate Change.

Add description of micro-hydro power to section on types of renewable energy, and of green roofs, storm cells and underground tanking to section on Sustainable Urban Drainage.

Additional factual information and references to information, and other minor changes set out in the schedule at Appendix A.

Simplify title to "Sustainable low-carbon Buildings".

Editorial changes to improve the structure and clarity of the document and as required by key changes above.

List of Organisations & Individuals Contacted during Consultation**Exercise**

6024 Preservation Society Limited	Bishops Itchington Parish Council
A W Morgan	Bishopton Avenue Residents' Association
A. E. Cox	Bishopton Residents Action Group
Abbots Morton Parish Council	Blockley Parish Council
ACRE (Policy)	Boddington Parish Council
Action for New Educational Resources for Alcester	Brailes Parish Council
Admington Parish Council	Bridgetown Residents Association
Advantage Alcester	Bridgman Services Ltd
Advantage West Midlands	British Horse Society
Age Concern Warwickshire	British Trust for Conservation Volunteers (Warks) (BTCV)
Alcester & District Local History Society	British Waterways (West Midlands)
Alcester Business Network	British Waterways South East
Alcester Chamber of Trade and Commerce	Brockhall Village Limited
Alcester Estates Ltd.	Bromford Housing Group
Alcester Opportunities	Bromsgrove District Council
Alcester SCAN	BT Group Plc
Alcester Town Council	Bude Canal Trust
Alderminster Parish Council	Burmington Parish Meeting
Alveston & Tiddington Allotments & Gardens Assoc.	Burton Dassett Parish Council
Alveston Villagers' Association	Business Link
Ancient Monuments Society	Butlers Marston Parish Council
Anthea Brace	Byfield Parish Council
Arrow Parish Council	C.J. & J.D. Cole
Arts Council West Midlands	Camping & Caravanning Club
Aston Cantlow Action Group	Caroline Nottage
Aston Cantlow Parish Council	Catesby Parish Council
Atherstone-on-Stour Parish Meeting	Central Networks
Avon Dassett Parish Council	Centre for International Transport Studies
B. Childs	Chadshunt Parish Meeting
Bancroft Cruisers	Chapel Ascote Parish Meeting
Barcheston & Willington Parish Meeting	Charlecote Parish Meeting
Barge Association	Charwelton Parish Council
Barton Willmore	Chastleton Parish Council
Barton-on-the-Heath Parish Council	Cherington & Stourton Joint Parish Council
Batsford Parish Council	Cherwell District Council
Bearley Parish Council	Chesterton & Kingston Parish Meeting
Beaudesert & Henley-in-Arden Joint Parish Council	Chris Toney
Beoley Parish Council	Church Lench Parish Council
Bickmarsh Parish Meeting	Claverdon Parish Council
Bidford Appraisal Group	Cleeve Prior Parish Council
Bidford Sports & Community Initiative	Clifford Chambers Parish Council
Bidford-on-Avon Health Centre	Clopton Conservation Committee
Bidford-on-Avon Parish Council	Color Estates Ltd
Bidford-on-Avon Residents Group	Combrook Parish Council
Billesley Parish Meeting	Commission for Architecture and the Built Environment (CABE)
Binton Parish Council	Commission for Rural Communities
Birmingham Road Action Group	Common Ground

Sustainable Low-carbon Buildings – Supplementary Planning Document – Consultation Statement

(October 2007)

List of Organisations & Individuals Contacted during Consultation

Exercise

Company of the Proprietors of Stroudwater Navigation	English Heritage (West Midlands Region)
Compton Scorpion Estate	Environment Agency
Compton Verney Parish Meeting	Environment Agency - Thames Region, West Area
Compton Wynyates Parish Meeting	Eric Ward
Cornwell Parish Meeting	Evenlode Parish Council
Cotswold District Council	Exhall Parish Council
Cotswold Line Promotion Group	Farming and Wildlife Advisory Group (FWAG)
Cotswolds Conservation Board	Farnborough Parish Council
Coughton Parish Council	Fenny Compton Parish Council
Council for British Archaeology (HQ)	FFT Planning (Friends Families and Travellers)
Council for British Archaeology (Region)	Forestry Commission
Council for Voluntary Service	Freight on Rail
Councillor Jill Dill-Russell	Freight Transport Association - Midlands Region
Councillor David Booth	Friends of the Earth - Stratford-upon-Avon
Councillor George Atkinson	Fulbrook Parish Meeting
Councillor Helen McCarthy	G B Harris
Councillor Nina Knapman	G. J. Botts
Councillor Richard Hyde	G.P. & C.M. Sampson
Country Land and Business Association (CLBA)	Gallagher Estates
Countryside Alliance	Garden History Society
Coventry & Warwickshire Friend	Gaydon Parish Council
Coventry and Warwickshire Learning and Skills Council	Geoffrey Prince Associates Ltd
CPRE (South Warwickshire)	George Wimpey South Midlands Ltd
CPRE Redditch Group	Georgian Group
CPRE Warwickshire Branch	Gloucestershire County Council
CTC (National HQ)	Gloucestershire Housing Association
Culture West Midlands	Gordon Brace
Cushman & Wakefield	Gordon Harrington
Cyclists' Touring Club - HQ	Government Office for the West Midlands (GOWM)
D E Harman	Great Alne Parish Council
Daventry District Council	Great Wolford Parish Council
David Atkinson	Greenpeace
David Wilson Homes	Greenway Association
Defence Estates	Groundwork UK
Defence Estates	Gypsy Council
Derbyshire Gypsy Liaison Group	Halford Parish Council
Development and Enabling Officer, Housing, SDC	Hallam Land Management Limited
Disability Living Foundation	Hampton Lucy Parish Council
Disability Rights Commission	Harbury Parish Council
Dorsington Parish Council	Harbury Society
DSM Demolition Limited	Harvington Parish Council
Earlswood & Forshaw Heath Residents' Association	Haselor Parish Council
East Midlands Regional Assembly	Health & Safety Executive
Ebrington Parish Council	Heart of England Tourist Board (HETB)
Emma Holman-West	Heart of England Way Association
English Golf Union - Golf Services	

List of Organisations & Individuals Contacted during Consultation**Exercise**

Hellidon Parish Council	Lighthorne Heath Parish Council
Help the Aged	Lighthorne Parish Council
Henley SC.AN	Lighthorne Society
Henley-in-Arden Society	Little Compton Parish Council
Highways Agency	Little Wolford Parish Meeting
Historic Narrow Boat Owners Club	Local Agenda 21 Forum
Hockley Heath Parish Council	Long Compton Parish Council
Hodnell & Wills Pastures Parish Meeting	Long Itchington Parish Council
Home Builders Federation	Long Marston Appraisal Flood Team
Honington Parish Meeting	Long Marston Parish Council (Marston Sicca)
Housing Corporation (West Midlands)	Loxley Parish Council
Howkins and Harrison	Luddington Action Committee
Idlicote Parish Meeting	Luddington Parish Council
ILEAP	M E Timms
Ilmington Parish Council	M Paddock
Ilmington Village Plan Working Group	M. Terry
Inkberrow Parish Council	Malcolm Murphy
Inland Waterways Amenity Advisory Council	Malvern Hills District Council
Inland Waterways Association	Mappleborough Green Parish Council
Inland Waterways Association - Warks Branch	Michael R. Wright
Inland Waterways Association (HQ)	Mickleton Parish Council
J Elliman	Midlands Architecture and the Designed Environment
J S Orchard	Midlands Architecture and the Designed Environment (MADE)
J. Branston	Mike Moody
J. E. Grantham	Miller Strategic Land
James Plaskitt, MP	Minitram Systems Ltd
Jephson Housing Association Group	Moreton in Marsh Town Council
Joan Graham	Moreton Morrell Parish Council
John Baylis	Morton Bagot, Oldberrow & Spennall Parish Council
John Bradley	MP for Mid-Worcestershire
John Bunting	Mr A. T. Alsop
John D. Hill	Mr and Mrs M. Luscombe
John Hughes	Mr Brian Moore
John Maples MP	Mr C Hodges
John Read	Mr C Swan
Joint Committee on Mobility for the Disabled	Mr G & Mrs G Lines
Jon King	Mr H. G. Hocking
JS Bloor (Services) Ltd.	Mr J. Morgan
K R Abraham	Mr J.M. and Mrs J.A. Kent
Kineton Parish Council	Mr N A M Butler
Kinwarton Parish Council	Mr Neil Hobday
Knight Frank	Mr R. W. Sharman
Ladbroke Parish Council	Mrs Andrea J. Blood
Lakes Partnership	Mrs E. J. Hart
Langley Parish Council	Mrs Halina Poloczek
Laura Mazzoli	Mrs J.D & Mr T. Clarke
Levvel Ltd	Mrs M Madge

List of Organisations & Individuals Contacted during Consultation

Exercise

Museums, Libraries and Archives West Midlands	R E Atkinson
Napton-on-the-Hill Parish Council	R Osborne
National Farmers Union	R W Abbey
National Federation of Young Farmers' Clubs	R. C. Huxley
National Grid	Race Equality Support Worker
National House Building Council	Radway Parish Council
National Housing Federation	Ragley Estate
National Playing Fields Association (NPFA)	Rail Freight Group
National Trust	Railway Development Society - West Midlands
Natural England	Railway Development Society (North Midlands)
Network Rail	Ralph and Alwena Maddern
Network Rail	Ramblers Association - Southam Group
Network Rail Infrastructure Ltd	Ramblers' Association - Stratford-on-Avon Group
New Facilities for Alcester High School Technology College	Ramblers Association (Warwickshire Area)
Newbold Pacey & Ashorne Parish Council	Ratley & Upton Parish Council
North and Middle Littleton Parish Council	Redditch Borough Council
Northamptonshire County Council	Redrow Homes (Midlands)Ltd
npower	Rembitt Ltd
Old Stratford & Drayton Parish Council	Renny Wodynska & Alan George
Open Spaces Society	Residents Against Shottery Expansion (RASE)
Orange Personal Communication Services Ltd	Retirement Security Ltd
Orbit Housing Association	Richard & Mandy Purser
Oversley Green Residents' Association	Richard A Moore
Oxfordshire County Council	Richard Anthony Moore
Oxhill Parish Council	Richard Marcus
P Beaman	Ridgewind Ltd
P Collins	RMC Group PLC
P Tawwer	Roba Metals Ltd
P. D. Burgess	Rochdale Canal Trust
Pathfinder Tours	Rollright Parish Council
Paul R Stanton	Rollright Trust
Pebworth Parish Council	Rowan Organisation
Peter J. & Jane M. Beeley	Royal Agricultural Society of England
Peter Marsh	Royal National Institute for Deaf People
Peter Narey	Royal National Institute for the Blind
Pettifer Group Ltd.	Royal Society for the Protection of Birds (RSPB)
Phil Holt	Rugby Borough Council - Planning Policy Team
Pillerton Hersey Parish Council	Rural Forum for Coventry, Solihull & Warwickshire
Pillerton Priors Parish Council	Rural Housing Enabler for Warwickshire
Power	Rural Housing Trust - HQ
Preston Bagot Parish Meeting	Salford Parish Council
Preston-on-Stour Parish Council	Salford Priors Parish Council
Priors Hardwick Parish Meeting	Salford Priors Residents' Action Group (SPRAG)
Priors Marston Parish Council	
Quinton Parish Council	
R Crompton	

List of Organisations & Individuals Contacted during Consultation

Exercise

Sambourne Parish Council	Stratford-upon-Avon Town Council
Sambourne Village Association	Stratford-upon-Avon Town Management Partnership
Sanderson Weatherall	Stretton-on-Fosse Parish Council
Severn Trent Water - Network Development	Studley Liberal Democrat Team
Severn Trent Water Ltd - StampS Team	Studley Parish Council
Shakespeare Birthplace Trust	Sustrans (Midlands)
Shakespeare Line Promotion Group	Sutton-under-Brailes Parish Meeting
Shakespokes	T. Coggins
Shipston SCAN	Tanworth-in-Arden Parish Council
Shipston-on-Stour Local History Society	Tanworth-in-Arden Residents Association
Shottery Village Association	Temple Grafton Parish Council
Shotteswell Parish Council	Thames Water
Simon Bosley	The Althorp Estate
Smith Bros & Webb Ltd	The Baker Trust c/o Fletcher King
Smiths Gore	The British Wind Energy Association
Snitterfield Parish Council	Theatres Trust
Society for the Protection of Ancient Buildings	Thomas Whitaker
Solihull Metropolitan Borough Council	Tidbury Green Residents' Association
South East Regional Assembly	Tiddington Residents Association
South Northamptonshire Council	Tiddington Road Residents Association
South Warwickshire Access Group	Tidmington Parish Meeting
South Warwickshire General Hospitals NHS Trust	Timothy Lea and Griffiths
South Warwickshire Housing Association	Todenham Parish Council
South Warwickshire PIE - Promoting Inclusion and Enterprise	Tourism West Midlands
South Warwickshire Primary Care Trust	Town & Country Planning Association
South Warwickshire Tourism Ltd.	Town Design Group
South West Regional Assembly	TRANSPORT 2000 (Hereford & Worcester)
Southam Town Council	Tredington Parish Council
Sport England West Midlands	Tredington Society
Staverton Parish Council	Trevor Honychurch
Stewart Ross Associates	Trinity Court Surgery
Stockton Parish Council	Trustees of the Grammar School of King Edward VI
Stour Power	Twentieth Century Society
Stratford District Manufacturers Association	Tysoe Parish Council
Stratford Rail Transport Group	Ufton Parish Council
Stratford Rugby Football Club	Ullenhall Parish Council
Stratford SCAN	United Co-operatives Ltd
Stratford upon Avon Town Trust	Upper & Lower Shuckburgh Parish Meeting
Stratford Voice	Upper Avon Navigation Trust
Stratford-on-Avon & South Warks Liberal Democrats	Upper Avon Navigation Trust Ltd
Stratford-on-Avon Cycling Campaign	Victorian Society
Stratford-upon-Avon Canal Society	Vinegar Hill Ltd.
Stratford-upon-Avon Rail Transport Group	W J Kliszewicz
Stratford-upon-Avon Society	W McCarthy
	Warmington Parish Council
	Warwick District Council - Policy & Projects Team

List of Organisations & Individuals Contacted during Consultation**Exercise**

Warwickshire and West Mids Association of Local Councils	Wootton Wawen Parish Council
Warwickshire Association of Village Halls	Worcester City Council
Warwickshire County Council	Worcestershire County Council
Warwickshire County Council - Countryside Recreation	World Class Stratford-upon-Avon
Warwickshire County Council (Education)	Wormleighton & Stoneton Parish Meetings
Warwickshire County Council (Museum Field Services - Archaeology)	Wychavon District Council
Warwickshire County Council (Museum Field Services - Ecology)	Wyre Forest District Council
Warwickshire County Council (Resources - Property)	Wythall Parish Council
Warwickshire Fire & Rescue Service	
Warwickshire Gardens Trust	
Warwickshire Geological Conservation Group	
Warwickshire Playing Fields Association	
Warwickshire Police	
Warwickshire Police	
Warwickshire Police	
Warwickshire Police	
Warwickshire Rural Community Council	
Warwickshire Rural Housing Association	
Warwickshire Rural Hub	
Warwickshire Wildlife Trust	
Watergall Parish Meeting	
Waterways Trust	
Weethley Parish Meeting	
Welford-on-Avon Local History Society	
Welford-on-Avon Parish Council	
Wellesbourne Parish Council	
Wellesbourne Village Society	
Wellesbourne Village Society	
West Midlands Planning Aid Service	
West Midlands Regional Assembly	
West Midlands Strategic Health Authority	
West Oxfordshire District Council	
Weston-on-Avon Parish Meeting	
Whatcote Parish Meeting	
Whichford Parish Council	
Whitchurch Parish Meeting	
William A Lowe	
William Davis Ltd	
Wilmcote Parish Council	
Winyates Green Residents Association	
Wixford Parish Council	
WMPTA (Centro)	
Wolverton Parish Council	
Women's National Commission	
Woodland Trust	

List of Agents Contacted during Consultation Exercise

A E Cox FRICS Chartered Surveyors	Bell Cornwell Partnership
A M Architectural Design	Berry & Young
A. Crowson	Berry Morris
A. Pickford	Bidford on Avon Residents Group (BARG)
A. Sowton	Bigwood Ltd.
Acanthus Clews Architects	Bigwood Ltd.
ACL Consultants	Bigwood Ltd.
Adams Holmes Associates	Bigwood Ltd.
ADC Ltd.	BM3 Architecture Ltd
Adcock Associates Design Practice	Boreham Consulting Engineers
Alan Smith	Bournville Architects
Alcester Estates Ltd.	Boyer Planning
Alexander Corfield	Brian Barber Associates
Alfresco Design Associates Ltd.	Brian G. Manning
Allied Management Services Ltd.	Brian L. King
Allison Millward Associates	Brian R. Bassett Ltd.
Althorp Estate	Brooke Smith Associates
Amec Design & Management	Brown Matthews
Andrew Grant & Co.	Brunton Design Associates
Andrew Nailor	Building Design Services
Andrew White	Burton Emery Partnership
Anthony J. Harman	Business Environments Planning
Architects Workshop	C J D Russell
Architectural Drawing Services	C. Baldwin
Architecture & Planning Group	Calarel Design Partnership
Arlington Planning Services	Carl A Middleditch
Arlington Securities plc	Carter Jonas
Armstrong Burton Planning	Cartwright Marston Estate Agents
Arrow Properties	Cater & Day
Arup Economic Consultants	CB Richard Ellis
Ashton Planning	Chancellors, Chartered Town Planning Consultants
Associated Construction Consultants	Charles Russell Solicitors
ATIS Real Weatheralls	Chartered Town Planning Consultancy
Atisreal	Christopher Hobson
B.D.S. Marketing	Christopher Stone MCIAT
Bainbridge & Co	Clive Brook Associates
Baker Associates	Cluttons
Baker Goodchild Architects	Cofton Land & Property
Banner Homes	Collin Jones Partnership
Barton Fellows Ltd.	Compton Estates Management Services
Barton Willmore Partnership	Cork Toft Partnership Ltd
Barton Willmore Partnership	Corstorphine & Wright
Barton Willmore Planning Partnership - HQ	Countrywide Property Management
Barton Willmore Planning Partnership-Eastern	Courtyard Designs
Basil Merrick	Cross & Harris
Batterton Tyack Architects	CSJ Brooke-Smith
BDP Planning	CT Planning
Beckett Associates	Cullen, Carter & Hill

Sustainable Low-carbon Buildings – Supplementary Planning Document – Consultation Statement

(October 2007)

List of Agents Contacted during Consultation Exercise

Cumming Architects	Fisher German Chartered Surveyors
D & T Holt	Fordham Research Ltd.
D N Cull	FPD Savills
D.H. Skeats, Designer	FPD Savills
Daly International	Framptons
David H. Robotham Ltd.	Framptons
David L. Walker Chartered Surveyors	Frank Price
David Lock Associates Ltd.	Frederick J. Young
David Storer & Partners	Freeth Cartwright Hunt Dickins
Day Design Group, Laurie	G Jones Associates
Debenham, Tewson & Cheshire Ltd. - Birmingham	G K Y Design, GKY
Debois Landscape Survey Group	G V A Grimley
Denham Design Partnership	G V A Grimley - Planning (Birmingham)
Denton Wilde Sapte	G. Rogers & Co.
Derek Latham and Associates	G.H.W. Ensor
Derek Lovejoy Partnership	G.P. Grima
Design & Materials Ltd.	G.T.D. Lewis
Design Roots	GB Partnership
Development Planning & Design Services Ltd	Geoffrey Parker Bourne
Development Planning Partnership	Geoffrey Wheeler and Associates
Dilworth Design	GL Hearn
Dixon, Dobson & Carver	Godfrey-Payton
Donald James & Partners	Gordon Herringshaw & Associates
Donald W. Insall & Associates (Chester)	Gough Planning Services
Donald W. Insall & Associates (London)	Gould Singleton Partnership
DPDS Consulting Group	Gouldens Solicitors
DPP	Graham Pearce & Company
Dreweatt Neate	Graham Steventon, Chartered Architect
Drivers Jonas	Granger & Jones
Drivers Jonas	Grodon Hall
DTZ Piedad Consulting	GVA Grimley
DTZ Piedad Consulting	H. Moore
E.H. Marston & Co.	Hadland Young Ltd.
E.R. Byron Associates	Halcrow Fox & Associates
E.S. Lodge Associates	Halliwell Landau
Eastbrook Associates (Architects) Ltd.	Hamptons
Easy Plan Ltd.	Hamptons
Ecotec Research & Consulting Ltd.	Hancocks Solicitors
Edmund Kirby	Harding Design
Elrick Smith	Harris Cooper & Co.
Entec UK Ltd.	Hawkes, Edwards & Cave
Entec UK Ltd.	Haxworth Architects
Entec UK Ltd.	Hayball Associates
ERB Associates	Hayward Smart Architects Ltd.
Ernest Berry	Healey & Baker
Estee Design Ltd.	Heath Avery Partnership
Evershed Wells & Hind	Henman Ballard
F.C.Newman & Co.	Heron Design
	Highpoint Rendel

Sustainable Low-carbon Buildings – Supplementary Planning Document – Consultation
Statement

(October 2007)

List of Agents Contacted during Consultation Exercise

Hitchman Stone Partnership	Knight Frank
Hives Planning	Knight Frank - London
Holden & Leonard	Knight Frank - Hereford
Holmes Antill	L.M. Uzzells, Designs
Holmes Bury Savage Hayward Partnership	Lancelot Dyson Associates
Horner Allen Partnership	Land Design Associates
Hossack Broome	Land Use Consultants
Howard & Seddon Partnership	Landmark Information Group
Howkins & Harrison	Lanesfield Technical Design
Howkins & Harrison	Lapworth Partnership Chartered Architects
Howkins and Harrison	Lawrence Jurman
Hugh Richards	Lee & Ross Architects
Hulme Upright Manning	Lee Evans Abbott de Moubray
Humberts - Tetbury	Llewelyn-Davies Planning
Hunt & Wood Partnership	Lloyds TSB - Property Management West
Hunter Page Planning	Locke & England
Ian Sleat	Locke & England - Leamington
Innes England	Lodders Solicitors
Interact Associates	Longview Consultancy
Intercull Designs	Loveitts
J Christopher Ashton	Loveitts - Leamington Spa
J H Kench	Lumar Developments Ltd.
J John Clink & Associate	Lyndon F. Cave
J. Tulip	M J Peters ARIBA
J.C. Cunnane Associates	M. Cox
J.D. Holmes	M.A. Ravenhill
J.M. Chambers	M.A. Riley
Jackson-Stops & Staff	M.J. Taylor
James Barr	MAC Design Services
Jesson Sewell & Swadkins	Magdalen College - Surveyor
Jigs Chana	Malcolm Judd & Partners
Joe Samworth & Associates	Malcolm Scott Consultants Ltd.
John B. Homer & Co.	Malcolm Timms
John Bradley Associates	Manning Design Group
John Chivers & Sons	Margaret Harris
John Earle & Son	Margetts
John Falconer Associates	Marson Architects
John Jones	Marson Rathbone Taylor
John P. Morris	Martin Elliot Partnership
John Pass Associates	Martineau Johnson
John Phillips Planning Consultants	Martyn Bramich Associates
John Spall Design Associates	Matthews and Goodman
Jones Lang Lasalle	Matthews and Goodman
Jones Lang LaSalle	McCoy Associates
Jones Lang LaSalle	Michael E. Megeary
K. Coffey	Michael Jones
Kember Loudon Williams	Michael Partridge Partnership
King Sturge	Michael Reardon & Associates

List of Agents Contacted during Consultation Exercise

Mono Consulting Ltd	R. Burman
Montagu Evans	R. Holtom
Mrs. M.G. Phillips	R. John Craddock Associates
MVM Planning Ltd	R.A. Davis
Nabarro Nathanson	R.A. Dunn
Nathaniel Lichfield & Partners - London	R.A. Newton
Needham & James	R.C. Lamb
Needham & James	R.J. Durrell
Neil Shepherd Design Ltd.	R.W. Fryer
Nicholas de Jong Associates	Rachel Berger
Nicholas Haycock & Co	Ragley Estate
Noralie Building Design Services	Rajkowski Architectural & Building Services
Oldfield King Planning	Ralphs & Janes
Oldfield King Planning	Rapleys
O'Neill & Bracewell Partnership	Raymond Smith
Ove Arup Partnership	Reg Ellis
Oxfordshire Building Surveying & Design Ltd.	Richard Chivers
P. Stanton, Esq	Richard Crook
P. Wilkes	Richard Merrett
P.D.B. Construction Services, PDB	Richard S Bailey RIBA
P.J. Rushton	Ridgehaven Project Development
P.N. Seabourne	RMJM Planning Ltd.
P.T. Pratt	Robert Cartwright & Co.
Patrick J. Burton	Robert F. Smith
Paul Dickinson Associates	Robert Franklin Architects
Paul Kentish & Co	Robert L. Blackburn
Paul Richardson Architects	Robert Lunn & Lowth
Paul Upfield	Robert Stephenson Associates
Peacock & Smith	Robert Turley Associates - Birmingham
Pegasus Planning Group	Robert Turley Associates - Bristol
Pegasus Planning Group	Robert Turley Associates - London
Pegasus Planning Group (East Midlands)	Robert Turley Associates - Winchester
Peter Bromwich & Co.	Roberts & Lloyd
Peter Clarke & Co.	Rodney Crossley
Peter Draper Associates	Rodney Melville & Partners
Peter E. Williams, Building & Design Consultant	Roger Abbott RIBA
Peter Green Associates	Roger Evans Associates
Peter Seccombe & Sarah Douglas	Roger P. Dudley & Associates
Peter Short R.I.B.A., Chartered Architect	Roger Stretton Architects
Peter Storrie & Associates	Roger Tym & Partners
Phillips Planning Services Ltd	Roger Tym & Partners
Pinsent Curtis	Roy Geden
Planaconstruct Ltd.	RPS Group plc
Planning Potential	RPS Group plc
Planning Potential	RPS Group plc
Professor Alan Hooper	RPS Planning & Development
Progression Architects Ltd.	RPS Planning Development
R & B M Gale	RPS Planning, Transport & Environment Ltd.

Sustainable Low-carbon Buildings – Supplementary Planning Document – Consultation Statement

(October 2007)

List of Agents Contacted during Consultation Exercise

Russell Little & Platt	Tweedale Planning & Design Group
S W Hinton BSc MRICS	Tyler-Parkes Partnership
Sanderson Weatherall	Vicki Gittus
Savills	Vincent & Goring Planning Associates
SB Architectural Design	W.J.L. Weaver
Schoonberg Walker and Associates	W.M. Chapman
Set Design	Walker Troup Architects Ltd.
Sheldon Bosley - Stratford-upon-Avon	Wallis Design Associates
Sheldon Bosley & Partners	Warwick Estates
Shipway, Doble & Earle - Redditch	Weatherall, Green & Smith
Shoosmiths Banbury	Weatherall, Green & Smith
Shoosmiths Solicitors	White Young Green Planning
Simon Herrick	White Young Green Planning
Simon Taylor, Chartered Town Planner	William McFarland
Skillington Payne	Wood Frampton
Smith Stuart Reynolds	Woolf Bond Planning
Spencers	Wootton Jeffreys Consultants Ltd - Epsom
Stanley Partnership	Wright Hassall & Co.
Stansgate Planning Consultants	WS Atkins Transportation Engineering
Stansgate Planning Consultants	WTS Ltd
Star Planning & Development	
Steven Holloway	
Stewart Ross Associates	
Stewart Vick Associates	
Stonehouse Chartered Surveyors	
Stoneleigh Planning Partnership	
Strutt & Parker	
Sutch & Thos. Hemming & Son	
Sutton & Wilkinson	
T G C Ford	
T.E. Leivers	
T.J. McHugh	
T.S.E. Cooper	
Terence O'Rourke	
Tetlow King Planning	
Tetlow King Planning	
Tetlow King Planning	
Tetlow King Planning	
The Residents of Friday Furlong	
The Roger Coy Partnership	
Thornton Hartnell Chartered Architects	
Three Counties Insurance Brokers	
Tim North Associates	
Timothy Lea & Griffiths	
Titmuss Sainer and Webb	
Tom Cole	
Tony Thorpe Associates	
Town & Country Properties	
Trevor Bury	

**Sustainable Low-carbon Buildings – Draft Supplementary Planning Document (SPD) (July 2007)
Schedule of Representations Received and the Council’s Response agreed at Executive October 2007.**

Changes made to the text of the SPD are shown in **bold**. ‘No change’ was made to text of SPD unless otherwise stated

Consultee	Section of SPD	Summary of Representations	The Council’s Response
1. Beaudesert and Henley-in-Arden Joint Parish Council (Cllr Matheou)	General	The SPD and its aims are supported. SDC should be more proactive in developing Combined Heat and Power for the whole District.	Support welcomed. However a district wide scheme is outside the scope of this SPD.
		Q1 Measures are appropriate but must make sure they are clearly defined and implications in relation to listed buildings, green belt etc explained.	Accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations, and to the section on types of renewable energy to highlight design and conservation issues.
		Q2. Lowest threshold to maximise impact. Comment that not possible for energy suppliers to control the mix of energy going to a particular home.	Support for low threshold noted. The SPD requires developments to generate their own energy on-site rather than sourcing green energy from suppliers.
		Q3 All new developments should achieve 20%, and also reach existing buildings by offering grants.	Noted. The SPD uses the draft PPS1 supplement’s standard of 10%, and the Council will look to review this figure through the Core Strategy.
	Procedural	The procedures should be simple and techniques fully explained. There should be discussion of financial aspects and any government or LA grants.	Noted. Section 8 of the draft SPD provides a simplified method for smaller developments, and many of the other sections are designed to provide explanation of techniques to meet the requirements. A reference to WEEAC as a

Consultee	Section of SPD	Summary of Representations	The Council's Response
			source of advice will be added.
2. BWEA (Gemma Grimes, Planning Advisor, British Wind Energy Association)	General	Considers the SPD a rigorous and progressive document. Welcomes coverage of policy context and design and construction issues.	Support welcomed.
		Q1 measures are satisfactory, add additional requirement for "developments to be designed to be adaptable so that alternative uses can be found for them as required".	Accepted. A question will be added to the checklist to require applicants to consider this issue, and a reference to the Lifetime Homes standard for guidance.
		Q2 support 100m ² threshold as will give local benefits.	Support for low threshold noted.
		Q3 10% is acceptable in short term, should be reviewed annually with potential for increase.	Noted. The reference to the council's intention to review and increase the percentage requirement in line with national and regional policy, and through the Core Strategy, will be retained in the final SPD.
	Renewable energy requirement	There may be occasional cases where integrated renewable energy equipment would be of little benefit in which case there should be flexibility for requiring higher levels of insulation, water conservation and locally sourced building materials instead.	Accepted. However it is considered that these occasional circumstances can be dealt with as an exception to policy, provided that the applicants can submit sufficient justification for the lack of renewables, and sufficient compensation in terms of other environmental standards.
3. Cotswolds Conservation Board	General	Welcomes this document and the	Support welcomed. Support for low threshold

Consultee	Section of SPD	Summary of Representations	The Council's Response
Conservation Board (Jeffery West, Chairman, Living and Working Sub- committee)		guidance provided. Q1 Measures are appropriate, no other requirements should be covered. Q2 100m ² /single dwellings Q3 10% is appropriate, higher % is not.	noted.
	Section 6.3 'Landscape Issues'	Reference could be made to need to consider landscape impact, particularly in AONB.	Partially accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations, and to the section on types of renewable energy to highlight design and conservation issues.
	Section 6.4 'Building Design Issues'	Reference could be made to need to consider local distinctiveness in relation to design and materials, particularly in AONB and Conservation Areas.	As above.
	Section 7 'Types of Renewable Energy'	Caveats need to be introduced in description of renewable technologies to avoid harm to AONB, following guidance in AONB Position Statement.	As above.
4. East Midlands Regional Assembly (Darren Horn, Spatial Planning)	General	Notes that East Midlands RSS includes core objectives of promoting high quality sustainable design and construction, reducing causes and impacts of climate change, and	Noted.

Consultee	Section of SPD	Summary of Representations	The Council's Response
		suggests all new development should show improvement against measures such as BREEAM assessment.	
5. English Heritage (Amanda Smith, Regional Planner)	General	SPD is welcomed. The final version should be informed by English Heritage interim guidance publications on climate change and Home Information Packs.	Accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations, and to the section on types of renewable energy to highlight design and conservation issues. A reference will also be added to useful English Heritage advice.
6. Environment Agency (Nadeem Sikander, Planning Liaison Officer)	Section 5 'Sustainable Urban Drainage'	Measures are appropriate and realistic but mention should be made of green roofs which provide many benefits. Add reference to recent guidance on SUDS.	Accepted. The section on SUDs will be amended to make reference to green roofs and to CIRIA: C697 SUDS Manual and CIRIA: C698 Site Handbook 2007.
7. Environment & Economy, Warwickshire County Council (Tony Lyons, Principal Planning Officer)	Renewable energy requirement	Suggest in some cases development could substitute financial contributions to a central district or community scheme rather than producing 10% individually.	Noted. However it is considered that unless such a scheme has been developed and consulted upon through the LDF, it will be more effective to require individual buildings to incorporate small-scale renewable technology.
8. Hallam Land Management Ltd (Ruth McKeown)	General	SPD takes a sensible approach, intention to align policy with Building Regulations is sensible, and 10% target is reasonable.	Support welcomed.

Consultee	Section of SPD	Summary of Representations	The Council's Response
	Threshold of 100m ² /1 dwelling	Threshold is not sufficiently flexible to allow for constraints and opportunities arising from individual sites, will have impact on housing trajectory and deliverability of small sites, and will impact on the ability to provide much needed affordable housing. Threshold should be 1000m ² /10 dwellings.	Not accepted. The SPD allows for different solutions in achieving requirements. No evidence has been submitted to suggest or substantiate deliverability claims. The supply of housing in relation to RSS figures will be monitored by the Council. It is considered that a low threshold is most appropriate and sustainable for this district (see Sustainability Appraisal).
9. Helical Bar (represented by Lucy Stone, Senior Planner, Barton Wilmore)	Requiring a % renewable energy, and threshold level.	Guidance should state that renewable energy should only be provided where it is viable to do so, as this is supported in principle but should only be required where it is viable, and compatible with other Local Plan objectives (e.g. historic environment).	Not accepted. No evidence has been submitted to suggest or substantiate that the requirement will make development unviable. While the draft PPS1 supplement gives regard to the overall costs of bringing sites to market, it gives no indication that the requirement for renewable energy should be subject to this caveat (para 22 and 23). The incorporation of 10% on-site renewables is estimated to increase build costs by 1%-6% (see Section 4 of the London Renewables Toolkit 2004). National policy will soon require such measures in any case. The SPD will be amended to clarify that other considerations, such as the historic environment, need to be taken into account when selecting a form of renewable energy.
		Threshold wording should clarify if applies to forms of development other than housing.	Accepted. The wording of the threshold will be altered to clarify the original intention that the policies refer equally to residential and non-residential development.

Consultee	Section of SPD	Summary of Representations	The Council's Response
	Information required on how scheme will meet Building Regulations	This wastefully duplicates work that is submitted to and approved by Building Control.	Partially accepted. This requirement corresponds directly to the requirement in para 34 of the draft PPS1 supplement to "demonstrate in broad terms how the proposed development will comply with the target carbon emission rate applicable through Building Regulations". The wording of the SPD requirement will be altered to more closely follow the wording of the PPS.
	Para 2.2.2 'materials with low energy input'	Guidance should state that reduced energy input materials should be used where appropriate taking into account all other considerations.	Accepted. A question will be included within the checklist to require applicants to consider this issue and explain their decision. This information will be taken into account when determining the scheme rather than being a definitive requirement.
	Section 4 'Applicants Checklist'	Scale plans of SUDs should only be required for full planning applications. At outline stage it is not always possible to provide this level of detail.	Accepted. The section on validation requirements will be modified to allow a description of the proposed scheme where full plans are not possible, and to include a sample condition to be used on outline planning consents agreeing principles to be followed when dealing with reserved matters.
	Section 6 'Energy efficient design'	Guidance should make clear that principles should be considered, but only incorporated where this is consistent with other planning considerations.	Partially accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations.

Consultee	Section of SPD	Summary of Representations	The Council's Response
10.Home Builders Federation (Hamma Mawson, Regional Planner)	General	The policies within the SPD could have a considerable impact on developments and their viability, so should be examined independently as a Development Plan Document. Evidence needs to be provided on the costs of achieving these requirements.	Not accepted. The requirements of the SPD are based upon examined and adopted Local Plan Policies DEV.7 and DEV.8. The form of the requirements is based very closely on latest government guidance in the draft PPS1 supplement which has itself been prepared based on evidence and subjected to a regulatory impact assessment. The incorporation of 10% on-site renewables is estimated to increase build costs by 1%-6% (see Section 4 of the London Renewables Toolkit 2004). However national policy will soon require such measures in any case.
		The SPD is not deliverable because planning professionals are insufficiently experienced to implement such policies.	Not accepted. The SPD has been specifically designed to include guidance on how to interpret and apply each section of the policies in the Local Plan. It is acknowledged that there are training needs for planning staff and these will need be addressed as officers gain experience through implementing the policies.
	Sect 2 'Requirements for planning applications'	The requirement for an Energy Statement and other information is counter to achieving a more efficient planning application system.	Not accepted. The requirement for this information is essential to ensure improved standards of sustainable building, and to comply with latest government guidance.
	Renewable energy requirement	Object to a requirement to install renewables on-site because:- - there may be more effective ways to reduce emissions, a financial	Not accepted. On-site renewables will achieve additional government objectives to meet the

APPENDIX 2

Consultee	Section of SPD	Summary of Representations	The Council's Response
		<p>to reduce emissions, e.g. financial contributions for a large-scale scheme outside the district, or improving energy efficiency of existing stock.</p> <ul style="list-style-type: none"> - small-scale renewable energy is not yet a proven technology so the requirement could damage consumer confidence in new housing in the district leading to market failure. - it may jeopardise the required supply of new housing, if the RSS figures increase. 	<p>additional government objectives to boost the market for renewables and increase awareness of the local implications of energy use.</p> <p>Not accepted. There is no evidence that including small-scale renewables will damage consumer confidence, and, especially with the introduction of Home Information Packs, may well improve the desirability of a home.</p> <p>Not accepted. No evidence has been submitted to suggest or substantiate this claim. The supply of housing in relation to RSS figures will be monitored by the Council.</p>
		<ul style="list-style-type: none"> - LPAs should accept the national framework for introducing the Code for Sustainable Homes whereas this SPD tries to go faster than the national timetable. - The SPD will become superseded in 2013 when Building Regulations will require renewables in any new homes. 	<p>Not accepted. The requirements of the PPS closely follow latest national guidance in Building a Greener Future and the draft PPS supplement.</p> <p>Not accepted. It is likely that the requirements of this SPD will be revised well before 2013 through the LDF.</p>
	Renewable percentage	A robust evidence base is required before setting any specific percentage requirement.	Not accepted. The draft PPS1 supplement gives 10% as a standard to be used before testing through a Development Plan Document.
	Procedural	HBF asks that the SPD acknowledges the recent good practice guide to pre-	Noted. It is considered that the procedures set out in the SPD follow the spirit of the Code

Consultee	Section of SPD	Summary of Representations	The Council's Response
		the recent good practice guide to pre-application discussions 'Constructive talk'. Para 3.2.1. should not include a test of adequacy when listing the information to be submitted with a valid planning application.	out in the SPD follow the spirit of the Good Practice Guide. However it is beyond the scope of this SPD to set out the Council's approach to all pre-application discussion.
	Section 6 'Energy efficient design'	Adequate guidance on this is set out within para 35 of the PPS1 climate change supplement. The SPD should also not attempt to influence internal layouts.	Not accepted. Para 35 sets out several of the principles contained within the SPD, but gives no explanation on how these could be implemented.
11.Housing Services, SDC (John Gordon)	General	Document is supported, but needs to improve arrangements for monitoring and enforcement, and supply baseline data on the District's emissions, with targets for reduction.	Support welcomed. Agree that this approach would be valuable but it is currently not possible to monitor carbon emissions on such a specific basis. The third phase of the RSS will be looking to address these issues and provide targets for authorities. The West Midlands Regional Energy Strategy (2004) establishes its baseline emissions data through multiplying the number of homes/industries etc by national averages – this method of estimation would not be useful to monitor the impact of a local strategy. It is proposed to monitor the number of permissions granted with a condition for inclusion of renewable energy.
		Q1 Measures are appropriate.	Noted.

Consultee	Section of SPD	Summary of Representations	The Council's Response
		Q2 Important to apply requirements to single dwellings to avoid differing standards.	Support for low threshold noted.
		Q3 Any percentage needs to be set with reference to target emission reductions and to make sure building new homes will not result in overall increase in district's emissions.	Noted. However 10% is given in the draft PPS1 supplement as a figure to be used prior to such an evidence base being established.
	Code for Sustainable Homes	All new housing should meet level 3 of CSH and follow Housing Corporation guidance to match the standards for affordable housing.	Not accepted. It is understood that this principle will be tested through the draft SPD Meeting Housing Needs. This Sustainable Low-carbon Buildings SPD closely follows the draft PPS1 supplement which does not advise that a Code level should be applied across all housing.
	Section 4 'Applicants Checklist'	Need information on how outline applications will be determined.	Accepted. The section on validation requirements will be modified to allow a description of the proposed scheme where full plans are not possible, and to include a sample condition to be used on outline planning consents agreeing principles to be followed when dealing with reserved matters.
	Climate resilient buildings	Need to ensure these considerations are taken into account in design process.	Noted. Several of the considerations link well with requirements in other sections of the document, and a question is included within the checklist ensuring that information on this will be taken into account when determining the application.

Consultee	Section of SPD	Summary of Representations	The Council's Response
12.Liberal Democrat Group at SDC (Cllr Nigel Rock)	General	Support document. The seriousness of climate change and its future cost of society require a rigorous approach to encourage sustainable practice.	Support welcomed.
		Q1. Measures are appropriate. There are other types of development that have a significant impact such as swimming pools, highly glazed structures and large impervious paved areas.	Noted. The principles of energy efficient design are intended to apply to all forms of development.
		Q2. 100m ² threshold or indeed any development requiring planning permission. Commercial as well as domestic buildings must be covered.	Accepted. The wording of the threshold will be altered to clarify the original intention that the policies refer equally to residential and non-residential development. Support for low threshold noted.
		Q3. 10% is appropriate. Opportunities are often at community level so policy could give an incentive/allowance for developers to consider incorporating more than 10% where this can be used on nearby sites.	Noted. It is considered that such arrangements will for now be made on a case by case basis if the situation arises.
	Section 13 'Code for Sustainable Homes'	Checklist should ask which level of the Code the development will achieve.	Accepted. The wording of the checklist question will be amended to ask which level of the code will be met.
	Section 6 'Energy efficiency'	Section should give more encouragement of energy efficient measures such as building fabric,	Accepted. The section on energy efficient design will be altered to place more emphasis on cooling and give advice on

Consultee	Section of SPD	Summary of Representations	The Council's Response
		controls and ventilation, and further emphasise issue of overheating.	building fabric, controls and ventilation.
	Sections 8 & 9 'Providing on-site renewable energy'	Concerned that calculation should allow for location sensitivity of renewable energy technologies. Suitable suppliers should be identified e.g. panel of professionals. Update CO2 conversion figures to DEFRA June 07.	Partially accepted. Reference will be made to the lists of installers certified by the UK Microgeneration Certification Scheme which can be sorted by region and type of renewable technology. The conversion figures will be updated. It is appreciated that renewable technologies are highly location sensitive, and the full methodology set out in the SPD makes allowance for this by requiring the final scheme to be sized by an appropriately qualified professional. However it is considered that at earlier stages, or for smaller schemes, a balance needs to be found between accuracy of percentage and practical demands of applicants.
	Section 5 'SUDS'	SPD should make reference to flood plains and vulnerable areas.	Noted.
13. Local Strategic Partnership Climate Change and Environment Group & Local Agenda 21 (joint response collated by Cindy Musgrave, WEEAC)	General	Welcome and support the SPD.	Support welcomed.
		Q1 Would like to see measures requiring low energy materials (including travel miles), waste	Partially accepted. It is proposed to include questions within the checklist to require applicants to consider these issues and

Consultee	Section of SPD	Summary of Representations	The Council's Response
		disposal and adaptable developments.	explain their decision. This information will be taken into account when determining the scheme rather than being a definitive requirement.
		Q2 Support lowest possible threshold.	Support for low threshold noted.
		Q3 Support 10% and would like higher percentage in Core Strategy e.g. 12% 2010, 15% 2012.	Noted. The reference to the Council's intention to review and increase the percentage requirement in line with national and regional policy, and through the Core Strategy, will be retained in the final SPD.
	Section 7 'Types of renewable energy'	Clarify wording "Ground sourced Cooling will only be considered ..." to remove double negative.	Accepted. The wording of this sentence will be improved.
		Energy use and production tables must quote figures which are considered generally acceptable by recognized experts/bodies to avoid potential future conflict. Sources should be listed for all figures.	Accepted. The tables will be amended to include reference more detailed figures provided by the Energy Saving Trust.
14.MOD (Catherine Goodwin, Defence Estates)	General	Are keen to work with SDC to technically assess any development in vicinity of safeguarded zones. Note that wind farms in particular can affect Mod establishments.	Noted.

Consultee	Section of SPD	Summary of Representations	The Council's Response
15.Cllr Andrew Patrick	General	Welcomes the SPD. Suggests production of a lightweight pamphlet for residents giving information on how to install renewable energy.	Support welcomed. Some information will be given in the Householder Guide which is due to be adopted by the council in October. Consideration will be given after this to what other information may be useful for residents.
16.Pegasus Planning Group (Katherine Meider, Senior Planner)	General	The document is unnecessarily prescriptive in its requirements. Local Plan Policies DEV.7 and DEV.8 already provide the LPA with the necessary comfort that developers will take energy efficiency into account for any development.	Not accepted. The SPD is designed to support the implementation of Policies DEV.7 and DEV.8 as it is considered that they are not currently implemented effectively.
	Renewable energy requirement	Research into viable technologies is still ongoing so it is premature to require a specific percentage. Instead the SPD should encourage applications to move towards the reduction of emissions without stating a specific percentage. It may not always be necessary to have energy production equipment.	Not accepted. The draft PPS1 supplement clearly sets out that local authorities should require a significant proportion of energy from renewable sources, and states that "in the interim period before plans are adopted it is proposed planning authorities should require a standard 10%" (Intro p.4 para 1.11).
	Energy efficient design	Support objective of energy efficient design and layout but objective to over prescriptive manner in which objectives are delivered.	Accepted. Changes to the section on energy efficient design will be made to clarify that these are guidelines to be balanced against other considerations.
	Awareness of Building Regulations Section 2	The SPD requires applicants to consider how Building Regulations will be met or exceeded. Object as this will be tested anyway at Building	Partially accepted. This requirement corresponds directly to the requirement in para 34 of the draft PPS1 supplement to "demonstrate in broad terms how the proposed

Consultee	Section of SPD	Summary of Representations	The Council's Response
	Section 2	Regulations stage.	development will comply with the target carbon emission rate applicable through Building Regulations". The wording of the SPD requirement will be altered to more closely follow the wording of the PPS.
	'Requirements for Planning applications'.	Outline planning applications should not have to provide details of the drainage solution, which can be dealt with by a condition.	Partially accepted. The section on validation requirements will be modified to allow a description of the proposed scheme where full plans are not possible, and to include a sample condition to be used on outline planning consents agreeing principles to be followed when dealing with reserved matters.
17.Preston-on-Stour Parish Council (Simone Bush, Parish Clerk)	General	As LPA is encouraging low carbon emissions, it should relax its insistence on single glazing being used in listed buildings and Conservation Areas.	The Council's approach to energy improvements to listed buildings follows English Heritage's "Building regulations and Historic Buildings' (2004). This guidance also gives useful alternatives to reduce heat loss through windows where double glazing is not appropriate.
18.Resources Directorate, Warwickshire County Council (Jonathan Horsfield)	General	The SPD is strongly welcomed and it is hoped other authorities in county will soon follow.	Support welcomed.
		Alternative title suggested.	Partially accepted. The title of the SPD will be simplified to 'Sustainable Low-carbon Buildings'.

Consultee	Section of SPD	Summary of Representations	The Council's Response
	Renewable energy threshold	Welcome low threshold of 100m ² . Question if this will cover changes of use. If developers object could phase in over 3 years. Concerned that having a threshold may encourage applicants to divide an application.	Accepted. The wording of the threshold will be altered to clarify the original intention that the policies refer equally to residential and non-residential development and to add the clause "new build, significant rebuilding and change of use from agricultural to residential or commercial)". Support for low threshold noted.
	Renewable energy percentage	Challenge statement that District has less scope for large-scale renewables.	Not accepted. This comment was sourced from the forecast for electricity generation in Annex E of the West Midlands Regional Energy Strategy, based on the 2001 GOWM/Halcrow assessment of renewable energy scope in the region which found that as one of only two landlocked regions in the country, the West Midlands lacks the significant potential of wave and tidal power.
		Request that percentage is increased to 15% as this is target in Local Area Agreement.	Not accepted. The SPD uses the draft PPS1 supplement's standard of 10%, and the Council will look to review this figure through the Core Strategy. It is not considered appropriate to increase this percentage unless supported by national and regional policy or a Development Plan Document.
	Section 2.2 'Other possible requirements'	It is too complicated to require materials with reduced energy input as too many factors including miles travelled and end performance. From June 2008 construction contracts over £250k will be legally required to produce Site Waste	Partially accepted. Rather than enforcing these measures, questions will be included within the checklist to require applicants to consider these issues and explain their decision. This information will be taken into account when determining the scheme rather than being a definitive requirement.

Consultee	Section of SPD	Summary of Representations	The Council's Response
		required to produce Site Waste Management Plans. Mechanism and enforcement still being decided nationally. 'Adaptable' developments are too difficult to define to be a requirement.	Reference will be made to the Lifetime Homes and BREEAM standards for guidance.
	Section 3 'Procedural steps to follow'	Question what requirements will be at outline stage. Suggest that requirements for scale plans of renewable technology be before work starts on site, as suppliers will be reluctant to design plans without a confirmed contract for installation.	Partially accepted. The section on validation requirements will be modified to allow a description of the proposed scheme where full plans are not possible, and to include a sample condition to be used on outline planning consents agreeing principles to be followed when dealing with reserved matters.
	Section 14 'Climate resilience'	Would like to see explicit requirement, or at least more explicit encouragement of resilience to future climate change, including leaving space and access for future measures. Could require information in Energy statement on this.	Noted. Several of the considerations link well with requirements in other sections of the document, and a question is included within the checklist ensuring that information on this will be taken into account when determining the application.
	Additional points	Concerned that encouraging thermal massing could encourage concrete which has high manufacturing energy requirements (Section 6.4 & 6.5).	Accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations, and also to note that local stone is a material with a high thermal mass.
		No mention of micro-hydro energy.	Accepted. Micro-hydro energy will be added to the section on Renewable Energy types.

Consultee	Section of SPD	Summary of Representations	The Council's Response
		Clarify definitions of floor area and add date and source for table in Section 8, Step 4.	Accepted. The tables will be changed to include and reference more detailed figures provided by the Energy Saving Trust.
		Suggest advice also for homeowners wanting to retrofit micro-renewables.	Noted. Some information will be given in the Householder Guide which is due to be adopted by the council in October. Consideration will be given after this to what other information may be useful for residents.
19.Saint Modwen (represented by Heather Blakey, Planner, Barton Wilmore)	General	SPD is welcomed as will enable Council to give clear and consistent advice on the issue. It is important developers are made aware of the requirements at an early stage in the development process.	Support welcomed. The SPD sets out the importance of raising the issues at pre-application stage.
	Sect 2.2 'Other possible requirements'	SPD should set out that re-use of existing buildings should be explored before buildings are demolished and new buildings erected. If materials with a reduced energy input are required, it should be acknowledged that this does not apply to existing buildings as re-use also reduces energy input.	Accepted. A comment will be added in the SPD on the energy efficiency of re-using buildings. A question will be included within the checklist to require applicants to consider low-energy materials and explain their decision. This information will be taken into account when determining the scheme rather than being a definitive requirement.
	Renewable Energy threshold	A threshold of 1000m ² /10 dwellings is considered most reasonable. If the threshold is 100m ² it should not be mandatory as this may result in a number of small scale development	Not accepted. No evidence has been submitted to suggest or substantiate this claim. The supply of housing in relation to RSS figures will be monitored by the Council. It is considered that a low threshold is most

APPENDIX 2

Consultee	Section of SPD	Summary of Representations	The Council's Response
		being unfeasible.	appropriate and sustainable for this district (see Sustainability Appraisal).
	Renewable Energy percentage	10% is appropriate. A higher percentage would cause cost difficulties to developers.	Noted.
20. Shottery Village Association (Ann Draycott)	General	Support renewable energy but methods must not be intrusive and wind turbines are not acceptable in residential areas. Support improved water and energy efficiency measures.	Support noted. Changes will be made to the section on types of renewable energy to highlight design and conservation issues. Renewable energy technologies suitability will be considered on a case by case basis and it is not accepted that wind turbines will be inappropriate in all residential situations.
	Sect 5 'Sustainable Urban Drainage'	Part H of the Building Regulations should be modified to stop any additional discharge into Shottery Brook, as run-off from recent intense development into the brook caused flooding.	Not accepted. Building Regulations are set through national legislation.
21. Stratford Voice (Martyn Luscombe)	General	Support principles and believe a threshold of 100m ² and 10% renewable energy is acceptable.	Support welcomed. Support for low threshold noted.
	Sect 5 'Sustainable Urban Drainage'	Building Regulations are inadequate to prevent further flooding in Stratford as watercourses and sewers are already at capacity so all run-off must be dealt with by soakaways. Soakaway capacity should be in relation to development plus likely	Noted but cannot be accepted. Building Regulations are set by national legislation, and the object of including SUDs requirements within this SPD is to ensure that they are considered at an early stage in the design process rather than to create new standards.

Consultee	Section of SPD	Summary of Representations	The Council's Response
		increase in paving etc over time.	
22. Taylor Wimpey (represented by Kathryn Ventham, Associate, Barton Wilmore)	Renewable energy requirement	p.30 of SPD acknowledges that requirement should not be too prescriptive for infill sites in order to allow renewable technology solution suitable to the site. This flexibility should be extended to all sites.	Noted. It is intended to allow applicants to meet the 10% requirement though any combination of acceptable renewable technologies to allow a solution suited to the site.
		Consider that affordable dwellings should be given allowance as increased construction costs will be contrary to need to keep initial costs affordable. Taking lower running costs into account is contrary to government documentation.	Not accepted. Neither the adopted Local Plan policy DEV.8 nor the draft PPS1 supplement makes any reference to an exception for affordable housing.
	Renewable energy threshold	1000m ² is the appropriate threshold, and 100m ² cannot be defined as "substantially similar" to this. There are no locally specific circumstances which warrant a lower threshold.	Not accepted. It is considered that a low threshold is most appropriate and sustainable for this district (see Sustainability Appraisal).
		Reference should be made to impact on cost of bringing houses to the market. It is likely the low requirement for housing in the RSS could increase in response to recent government targets, making it more likely that the requirement will jeopardise housing delivery.	Not accepted. The supply of housing in relation to RSS figures will be monitored by the Council. The incorporation of 10% on-site renewables is estimated to increase build costs by 1%-6% (see Section 4 of the London Renewables Toolkit 2004). However national policy will soon require such measures in any case.

Consultee	Section of SPD	Summary of Representations	The Council's Response
	Renewable energy percentage	10% is appropriate any higher percentage would need to be set out in a DPD. A uniform method for calculation must be applied.	Noted. The SPD sets out a calculation and standard method to be followed by applicants and case officers.
	Procedures	The Council must be clear of its views where there is a potential conflict between low carbon development and other considerations.	Accepted. Changes will be made to the section on energy efficient design to clarify that these are guidelines to be balanced against other considerations, and to the section on types of renewable energy to highlight design and conservation issues.
		Objection to statement that applications will not be validated without certain documentation. Outline applications can be accompanied by a site-wide drainage strategy, but detailed design of SUDs and renewables is not possible until matters normally left until Reserved Matters have been agreed.	Accepted. The section on validation requirements will be modified to allow a description of the proposed scheme where full plans are not possible, and to include a sample condition to be used on outline planning consents agreeing principles to be followed when dealing with reserved matters.
		There should be no requirement for a stand alone Energy statement as the matters can be covered within the Design and Access statement.	Not accepted. The information required in the Energy Statement is important, and distinct from the information currently required in the Design and Access Statement.
	Sect 10 'Combined Heat and Power' and Sect 12 'Building Regulations'	Objects to references to matters covered by Building Regulations e.g. CHP, as government guidance specifies that planning and building control should "complement and not duplicate each other".	Partially accepted. This requirement corresponds directly to the requirement in para 34 of the draft PPS1 supplement to "demonstrate in broad terms how the proposed development will comply with the target carbon emission rate applicable through Building

Consultee	Section of SPD	Summary of Representations	The Council's Response
		duplicate each other".	Regulations. In particular applicants should explain the contribution to be secured through decentralised energy supply systems". The wording of the SPD requirement will be altered to more closely follow the wording of the PPS.
		The requirement to demonstrate how larger schemes will meet Building Regulations should be for the predicted commencement not completion date.	Accept. The wording of the SPD requirement will be altered to more closely follow the wording of the PPS including this correction.
		The explanation sections should be removed as this is covered under separate legislation.	Not accept. These sections are included for information only to aid applicants and case officers in implementing the requirements of the SPD.
23.Thames Water Property Services (Georgie Cook, Planning Administrator)	General	For any development within their area, early consultation is required with Thames Water regarding the capacity of the sewerage system.	Noted.
24.Warwickshire Museum Services, Warwickshire County Council (Jonathan Parkhouse, County Archaeologist)	General	SPD's content and intentions are supported. Reducing emissions will protect the historic environment.	Support welcomed.
		The SPD should acknowledge that when designing low-carbon schemes	Accepted. Changes will be made to the section on energy efficient design to clarify

Consultee	Section of SPD	Summary of Representations	The Council's Response
		consideration should still be given to impact up on the historic environment including archaeology. For example soakaways may need mitigation to avoid damage to listed buildings, ground source heating may be inappropriate in areas of archaeological sensitivity. Wind turbines and solar may be inappropriate on some buildings of architectural sensitivity.	that these are guidelines to be balanced against other considerations, and to the section on types of renewable energy to highlight design and conservation issues.
25. Warwickshire Museum Services, Warwickshire County Council (Anna Swift, Ecologist)	Sect 1.3 'Policy background'	Should contain a reference to Warwickshire Climate Change Strategy 2006.	Accepted. A reference to the Strategy will be included in the Policy Background section of the SPD.
	Renewable energy requirement	Warwickshire Local Area Agreement sets a target of Local Authorities requiring 15% renewable energy for major developments.	Not accepted. The SPD uses the draft PPS1 supplement's standard of 10%, and the Council will look to review this figure through the Core Strategy. It is not considered appropriate to increase this percentage unless supported by national and regional policy or a Development Plan Document.
	Sustainable Urban Drainage	Highlights the ecological benefits of ponds and wetlands.	Accepted. A note of the benefits to biodiversity will be added in section 5.3.
26. Wm Morrison Supermarket Plc (represented by Peacock and Smith)	General	Strongly objects to the SPD as many of the requirements fall outside the scope of planning legislation.	Not accepted. The requirements of the SPD are based upon examined and adopted Local Plan Policies DEV.7 and DEV.8. The form of the requirements is based very closely on latest

APPENDIX 2

Consultee	Section of SPD	Summary of Representations	The Council's Response
			government guidance in Building a Greener Future and the draft PPS1 supplement.
		Object to requirement to demonstrate how will meet Building Regulations and to incorporate SUDs, as PPS1 para 30 states planning policies should not replicate other requirements such as Building Regulations.	Not accepted. This first requirement corresponds directly to the requirement in para 34 of the draft PPS1 supplement to "demonstrate in broad terms how the proposed development will comply with the target carbon emission rate applicable through Building Regulations. The second requirement is supported by Policy DEV.7 in the examined and adopted Local Plan and is intended to ensure that SUDs are considered at an early stage in the design process rather than create new standards.
	Renewable energy requirement	SPD should encourage, rather than require, the provision of 10% renewable energy in developments over 1000m ² . Any renewables policy must include the caveat set out in PPS22 para 8 that this is only required where it is viable and does not place an undue burden on developers. If the policy is not flexible this could lead to a direct loss of potential investment and regeneration in the District.	Not accepted. No evidence has been submitted to suggest or substantiate that the requirement will make development unviable. The advice in PPS22 has now been superseded by the draft PPS1 supplement. Para 1.6 of the Introduction to this draft states that "where there is any difference in emphasis on climate change between the policies in this PPS and others in the national series, this is intentional and this PPS should take precedence". While the draft PPS1 supplement gives regard to the overall costs of bringing sites to market, it gives no indication that the requirement for renewable energy should be subject to such a caveat (para 22 and 23).