



**Development Requirements Supplementary Planning Document (SPD)
Consultation on draft Part V (Climate Change Adaptation and Mitigation)
9 January to 21 February 2020**

**Consultation Statement
New Part V (Climate Change Adaptation and Mitigation)**

**Stratford-on-Avon District Council
May 2020**

Components of consultation undertaken on the draft SPD

The draft Part V (Climate Change Adaptation and Mitigation) was published on Thursday 9 January for a six week consultation period until Friday 21 February 2020.

The consultation comprised the following:

1. A public notice in the Stratford Herald (on 9 January), Midweek News (on 14 January) and the Leamington Spa, Stratford-upon-Avon and Redditch Observers (on 9 and 10 January) newspapers which circulate in the district area;
2. A press release was issued by the District Council on 9 January 2020 notifying of the consultation;
3. A specific page on the District Council's website providing links to the consultation documents, interactive and pdf comments form;
4. Use of social media to promote the consultation and the public drop-in session
5. A leaflet summarising the key aspects of the draft SPD and signposting how people could get involved in the consultation
6. Emails and letters sent 9 January to Parish and Town Councils in the District, ward members, along with agents, developers, agencies, organisations and residents registered on the policy consultation database;
7. Paper copies were made available for inspection at the District Council offices and at libraries in the District;
8. A public drop-in session at the District Council offices on Tuesday 4 February between 3-7pm; and
9. A Stakeholder Workshop at the District Council offices on the morning of Friday 7 February.

These means of consultation are consistent with the provisions of the District Council's Statement of Community Involvement.

Responses to the draft Part V of the SPD

A total of 60 responses were received from individual sources including members of the public (22), developers/businesses (12), agencies (11), lobby groups (7), Parish/Town Councils (7) and District Councillors (1). Within these responses a total of 301 individual comments were made.

The following schedule provides an outline of the comments received by topic, together with an assessment of them. It also identifies changes to be made in the final version of the SPD in response to these comments.

If text is to be deleted from the draft SPD it is shown ~~struckthrough~~. If new text is to be inserted it is shown underlined.

A number of comments, although helpful, are beyond the scope of the SPD itself. However, these have been captured and have been passed on to the relevant organisation or SDC Department for their consideration. This includes a number of comments relating to specific climate change actions that have been passed onto the Council's Climate Change Panel.

Representations on consultation 9 January to 21 February 2020

Index of Respondents

A Jonathan Horsfield	Long Compton Parish Council - Clerk
Adrian L Kenyon	Louise Appleton
Alcester Town Council	Miranda Forrester
Anna Corser	Mrs Irene Beever
Bidford-on-Avon Parish Council - Clerk	Napton-on-the-Hill Parish Council
Bloor Homes Western	National Grid
Bourne Leisure Limited	Natural England
Canal & River Trust	Network Rail - LNW
Clare Charlton	Peter Chaddock
Climate Change Emergency Panel Group - Stratford-upon-Avon Town Council	Public Health Warwickshire - Communities Group
Cllr Nigel Rock	Sarah Price
David Pashley	Shipston Area Flood Action Group
DB Hodgson	Shipston-on-Stour Town Council
Delta Planning	Simon Forrester
Di Brennan	St Joseph Homes Limited
Dr R J Tucker	St Modwen Developments
Environment Agency - Sustainable Places	Stephen Norrie
Facilities Integration Ltd	Strategic Catchment Planner - Severn Trent
Gladman Developments	Stratford Friends of the Earth
Hallam Land Management	Stratford Town Transport Group
High Speed Two (HS2) Ltd	Stratford-on-Avon Cycle Forum
Highways England	Swanston Holdings PLC
Historic England	Sylvain Verstraeten
IM Land	The Inland Waterways Association (Warwickshire Branch)
IM Properties	Tom Smerdon
J A Nixon	Warwickshire County Council - Flood Risk
Joanne Taylor	Warwickshire County Council - Planning and Development
John Hale	Warwickshire Wildlife Trust
John Stott	Welford-on-Avon Parish Council
John Veasey	William Davis Ltd

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
General Comments				
Swanston Holdings PLC	General	The Respondent considers that the SPD is another difficulty put in the way of developers and house owners and is a pointless exercise.	Not agreed. The purpose of the planning system is to ensure that new development works towards the public good. The SPD provides guidance in respect of the greatest environmental challenge facing society. The SPD is to provides clarity to all those involved in the development process on the interpretation and application of existing Council planning policies relating to climate change adaptation and mitigation and as such is considered to have a range of benefits.	None.
National Grid	General	The Respondent has no comments to make in relation to this consultation.	Noted.	None.
Dr R J Tucker	General	The Respondent considers that whilst the draft SPD provides a valid list of technologies applicable to any location in the UK, it doesn't address how projects can be supported commercially and how ideas can be turned into actions. If local government is serious about addressing climate change, then local businesses and householders need support in setting up viable energy saving and renewable energy projects. Many of these technologies are now commercially viable at a reasonable scale. Local authorities could have a role in identifying viable multi-user or community funded opportunities, and putting the right	Comments noted, however the issues raised are outside the scope of the SPD. As part of its commitment to tackling climate change the Council has established a Climate Change Panel to spearhead such projects, including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.	None.

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		<p>agencies and stakeholders together to encourage uptake. The cessation of the FiT and its replacement with the Smart Export Guarantee (SEG) does not as its stand, guarantee a secure income stream for renewable energy power projects, unless the power generated is used to displace existing grid supply.</p>		
<p>Long Compton Parish Council - Clerk</p>	<p>General</p>	<p>The Respondent expresses support for the SPD.</p> <p>The Respondent is particularly interested in seeing more thought given to longer term implications for climate and environment as part of planning and other relevant policies</p>	<p>Support Noted.</p> <p>The Council is due to commence a review of the Core Strategy in 2020, within which climate change and environmental matters will be a key consideration.</p>	<p>None.</p>
<p>Joanne Taylor</p>	<p>General</p>	<p>The Respondent is pleased to see the draft SPD but would prefer that it was more ambitious with more compulsory items required.</p> <p>The Respondent would like the Council to achieve higher than Building Regulations goals on properties, noting that there is a push for government legislation for new buildings to be carbon neutral by 2025.</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>Within Section V.3.2 (Using Energy More Efficiently) the SPD encourages applicants to commit to incorporating energy efficiency measures that go beyond the minimum building regulation standards.</p>	<p>None.</p>

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Louise Appleton	General	The Respondent believes that this is a positive step and thus supports the SPD.	Support Noted.	None.
Di Brennan	General	The Respondent has grave misgivings about how the proposed SWRR seems to violate at least 3 of the 5 principles within the SPD. The Respondent is concerned that the proposed relief road could be given the go-ahead because the application pre-dates and requirement to take this Part V of the SPD into account.	The SWRR is outside of the scope of the SPD as it is a strategic infrastructure project. The SPD can only expand on and provide guidance to existing planning policy contained in our Core Strategy, so it cannot comment on the SWRR or mandate the location of new development.	None.
Warwickshire Wildlife Trust	General	<p>The Respondent considers that the wording in the SPD should be much stronger. It references words like 'should' which leaves open the option of not doing something. Wherever possible words like 'must' and 'will' would be more appropriate to provide absolute clarity of the minimum required standards.</p> <p>The Respondent considers that a holistic approach should be taken whereby any one element is not viewed in isolation. A developer proposing to plant trees for example can deliver against reducing flood risk, urban cooling and biodiversity as part of that if the right trees are selected in the right place. There is a danger that a disjointed approach where point scoring encourages developers to compartmentalise their actions, which could result in reduced</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>Agree that it is important that the measures integrated into individual developments should be considered as a whole and not in isolation in order to maximise benefits and reduce the need for future retrofitting. However in order to keep the application of the SPD straightforward and transparent the use a weighting system is not considered appropriate. Instead it is proposed that reference is made in section V8 (Climate Change</p>	<p>None.</p> <p>Add a new penultimate paragraph to section V8 (Climate Change Checklist) to read: <u>"A holistic approach should be taken to the incorporation of measures into developments to ensure that they are considered as a whole and not in isolation. This will ensure that the benefits can be maximised and will reduce the need for future retrofitting."</u></p>

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		<p>impact and the need to retrofit other solutions at greater expense.</p> <p>The Respondent suggests that cross referencing should be improved to ensure that if things are read in isolation by a developer or a planning officer that opportunities to deliver multiple outcomes are secured. A weighting system added to the checklist that recognises links between points in the SPD could enable all sides to see the value of joined up thinking.</p>	Checklist) to clarify that measures need to be considered holistically.	
Anna Corser	General	The Respondent supports the measures in the SPD and notes that whilst they will be very unpopular with developers, the Council should stand firm and get the SPD adopted as soon as possible.	Support Noted.	None.
Dr Brennan	General	The Respondent considers that the principles within the SPD should be applied to current planning applications as urgent action is required now and some of these applications may take years to come to fruition.	Once the SPD is adopted it will be applied to planning applications within the District.	None.
Facilities Integration Ltd	General	The Respondent considers that the draft SPD is informative but lacking in real intent.	The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about	None.

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		<p>The Respondent queries whether the measures are applicable to non domestic buildings as this is not clear.</p> <p>There must be more commitment in expectation. There should be much more emphasis on 'must' than 'should' and a true expectation of compliance from planning onwards. The Council cannot expect compliance from guidance unless it enforces a direction, otherwise it is just another 'nice to have' set of weak words.</p> <p>The Respondent considers that it is only worthwhile if supported by equally stringent Building Regulations and a strong inspectorate as if there is less money for enforcement then strict rules must apply to ensure that those flouting them are brought to task.</p>	<p>which measures they choose for specific sites.</p> <p>The measures set out within the SPD apply to all types and uses of development. Agree that this could be clarified within the introductory section of the SPD.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>Within Section V.3.2 (Using Energy More Efficiently) the SPD encourages applicants to commit to incorporating energy efficiency measures that go beyond the minimum building regulation standards.</p>	<p>Within the first box at the bottom of section V1 on page 4 amend the first sentence to read: <u>"Checklists for applicants of new residential, non-residential and residential householder proposals</u> to provide a minimum level of climate change adaptation and mitigation measures, centred around 5 key principles, are provided within Appendices 1-3."</p> <p>None.</p>

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		<p>The Respondent considers that it is a pity that the Council is addressing this so late in the day when there has already been the allowance of larger residential schemes within the last couple of years.</p>		
DB Hodgson	General	<p>The Respondent considers that whilst the SPD explores an extensive range of options for future built environment developments it totally overlooks the significance of the current built environment. It is inadequate to address on the 20% increase in the built environment that will occur over the next 20-30 years, initiatives, support and funding is vital for the 100% that exists today.</p> <p>There is a need to ensure that changes of policy relating to building and environmental standards over the last 30 years are tested again.</p> <p>The Respondent is concerned that the scope of the SPD is such that it will slow down the future evolution of the District as a lot of it is a recipe for failure unless the requirements can be laid out in a simple open fact-based process that is easy to follow and assess performance against clear prescribed criteria.</p> <p>The Respondent notes a number of climate change related inefficiencies within the Council such as building heating, use of paper, requirements</p>	<p>The SPD, through the planning process, relates to the incorporation of climate change measures into new developments. This includes changes of use, conversions and residential householder developments.</p> <p>Agree that it would be helpful to include information of retrofitting into the SPD</p> <p>The Council is due to commence a review of the Core Strategy in 2020, within which climate change and environmental matters will be a key consideration.</p> <p>It is considered that the use of the checklists for difference types of development is sufficiently clear in order to identify which measures will be incorporated into a particular development, and to enable effective monitoring to be undertaken.</p> <p>Comments noted, however the issues raised are outside the scope of the SPD.</p>	Add new Section V.2 (Retrofitting into existing buildings) into the SPD.

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		<p>for residents are required to attend in person for certain services, and employees using private cars to travel to work.</p> <p>The Respondent suggests that the free park and ride bus should be extended to include free rail transfer from Stratford Parkway Station to Stratford Station. In addition the Respondent suggests the introduction of electric shuttles enabling the Honeybourne rail link to be put in without affecting the road.</p> <p>The Respondent raises concern about the SPD appearing to reject/restrict the measures in the SPD to non-heritage assets as everything has to make a contribution to climate change mitigation and adaptation.</p> <p>The Respondent suggests that the Council should share its expertise with businesses.</p>	<p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p> <p>The SPD does not restrict the measures in relation to heritage assets but acknowledges that consideration on the impact on the asset will need to be taken into account when considering measures.</p> <p>The Council is keen to work with developers to maximise the opportunities for climate change adaptation and mitigation in new developments. The production of this SPD is part of this sharing of knowledge and information.</p> <p>It is hoped that the production of this SPD will provide guidance and advice to businesses.</p>	
Historic England	General	The Respondent welcomes the inclusion of references to the historic environment and have no further comments to make.	Support Noted.	None.

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High Speed Two (HS2) Ltd	General	The Respondent has no specific comments to make.	Noted.	None.
IM Properties	General	The Respondent is supportive of the Council's commitment to tackling climate change and is willing to work with the Council and other stakeholders to contribute to national carbon neutral targets. The Respondent supports the purpose and aim of the SPD in that it will provide guidance on how new development should adapt to and mitigate the effects of climate change at a building and/or site wide scale	Support Noted.	None.
Highways England	General	The Respondent supports the objectives of the SPD. The Respondent considers that the SPD can be more forthright in its requirements and this can be done through more direct use of language. Many of the requirements are identified as a should or consider but the Respondent suggests that these words are replaced with more persuasive wording, including the use of 'must' and 'are required to', especially to promote the use of sustainable modes of transport and low carbon fuels.	Support Noted. The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.	None.
Welford-on-Avon Parish Council	General	As representatives of a village vulnerable to flooding the Respondent is pleased to see the SPD which, once adopted, could bring important and beneficial changes to the future development of the village and positively influence the way	Support Noted. The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use	None.

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		<p>developers design and plan new development.</p> <p>The Respondent considers that the SPD reads more as advisory guidelines and would allow developers to do the minimum required for adaptation and mitigation. As such the requirements must be more forceful, e.g. changes references from 'should' to 'must'.</p>	<p>of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p>	
Natural England	General	<p>The Respondent offers general support for the SPD.</p>	<p>Support Noted.</p>	<p>None.</p>
Gladman Developments	General	<p>The Respondent supports the content proposed in the SPD but suggest a number of revisions to ensure that the development goals sought by the Council can be delivered without impediment.</p> <p>The Respondent notes that SPDs cannot be used as a fast track mechanism to set policy and should not be prepared with the aim of avoiding the need for examination or reinventing existing planning policy which should be examined. SPDs are not subject to the same degree of examination and consultation as policies contained in Local Plans and therefore should only provide additional guidance for those bringing forward development proposals across the district. The role of the SPD should, therefore, seek to provide guidance on existing planning policy contained in the adopted Development Plan.</p>	<p>Comments Noted. The purpose of the SPD is to provide additional guidance on the interpretation and application of existing Core Strategy policies, and as such does not set new policy. The status of the SPD is clearly set out within page 3 of the SPD.</p>	<p>None.</p>

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Stephen Norrie	General	<p>The Respondent considers that the draft SPD is a useful survey of many of the options available to developers to reduce emissions and climate impacts. The principles chosen are sound, and well explained, and the inclusion of case studies is helpful. The checklist approach seems appropriate, as this should make thinking about emissions reductions and adaptation a normal part of the planning process.</p> <p>The Respondent recommends some way in which the SPD could be improved:</p> <ul style="list-style-type: none"> • The SPD should consider 'embodied carbon' which are the emissions created during construction – possibly through a 6th Principle 'Reducing embodied carbon emissions'. The Respondent suggests the use of an embodied carbon measurement tool, Beacon which developers could be required to use to demonstrate a level of embodied carbon efficiency set by the Council. The respondent provides a number of suggestions and information on embodied carbon emissions. • A stronger carbon emissions target should be set for new builds as councils are currently able to set energy standards 	<p>Support Noted.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered including embodied carbon.</p>	None.

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		<p>for new builds up to a level of a 19% carbon emissions reduction over 2013 Building Regulations, as has been done by other Councils. The Respondent suggests that such a requirement should be introduced into the SPD or a review to the Local Plan in advance of the CS review.</p> <p>Language in the SPD could be stronger using 'must' rather than 'should'. It is also sometimes unclear who 'should' do something – this could be interpreted as requirements for the Council rather than developers. The Respondent also suggests avoiding the word 'consistent' which is a weak word.</p>	<p>The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p>	
Climate Change Emergency Panel Group - Stratford-upon-Avon Town Council	General	The Respondent considers that the SPD is comprehensive in terms of measures that could be applied to developments, appreciating the often rural setting of the District. The Respondent considers that overall the SPD is an excellent start for encouraging developers to put	Support Noted.	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		<p>environmental considerations at the heart of their design.</p> <p>The Respondent suggest that the Council sets a merton style planning conditions for renewable energy.</p> <p>To ensure delivery, the Respondent suggests that there should be an ongoing plan to determine how effective the SPD is in actually delivering environmentally friendly measures. This monitoring plan needs to be in place prior to adoption of the SPD so that suitable effectiveness measurements can be taken. Success should be judged at a fixed point in time, no later than two years from adoption.</p> <p>The Respondent suggest the use of awards for those developers who embrace what is trying to be achieved and plan their developments using the guidance. This could be by way of recognition by the Council for good and ambitious plans.</p>	<p>The powers afforded in the 2008 Planning and Energy Act relating to the use of 'merton-style' renewable energy requirements only relate to Development Plan Documents and not to Supplementary Planning Documents. As such it is not possible to include such requirements with the SPD. The introduction of renewable energy requirements will be considered as part of the Core Strategy review.</p> <p>Agree that monitoring the effectiveness of the SPD will be important, as it will inform any review and also feed into the Core Strategy review.</p> <p>Comments noted, however the issues raised are outside the scope of the SPD. The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to</p>	<p>None.</p> <p>Add two new sentences at the end of section V.8 as follows: <u>"The Council will monitor the effectiveness of the SPD through the analysis of checklists on individual planning applications. This will inform any review of the SPD."</u></p>

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
			the Council's Climate Change Panel.	
Warwickshire County Council - Planning and Development	General	<p>The Respondent welcomes the SPD, noting that it brings together flooding, biodiversity, transport and promoting energy efficiency for buildings which will reduce the impact on the environment.</p> <p>The Respondent noted that Warwickshire County Council has declared a Climate Change emergency, and the report to WCC's Cabinet in December 2019 largely supports the SPD.</p>	<p>Support Noted.</p> <p>Comments Noted.</p>	None.
Simon Forrester	General	<p>The Respondent is encouraged that the Council is developing policies to cope with climate change.</p> <p>The Respondent's main concern is that the Council may not have grasped the seriousness of the situation. This is a climate change emergency and climate change policies must not be add-ons. Consequently the 5 principles should override all other policies.</p>	<p>Support Noted.</p> <p>The status of this document is as supplementary planning guidance and does not in itself set planning policies, nor can it override existing policies. The planning policies for the District are set out in the adopted Core Strategy. The Council is due to commence a review of the Core Strategy in 2020, within which climate change adaptation and mitigation will be a key consideration.</p>	None.
Napton-on-the-Hill Parish Council	General	<p>The Respondent supports the principles covered in the SPD.</p> <p>The Respondent considers there should be a more consistent strong wording throughout the document relating to driving potential actions.</p>	<p>Support Noted.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the</p>	None.

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		<p>This is key to avoid developers have an excuse for not thinking through the options and delivering significantly improved performance on areas within the SPD.</p> <p>The Respondent suggests that the section on renewable energy should be reviewed and updated as is concerned that some of the information is out of date and misleading.</p>	<p>quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>The purpose of the section on renewables energies is to summarise the main types available and not be overly detailed in terms of the actual technology. The summaries included are considered to provide up to date information, and without more detail from the respondent it is not possible to consider which aspects they consider to be out of date.</p>	
Public Health Warwickshire - Communities Group	General	<p>The Respondent is pleased to see that many elements of their 'Promoting Health and Wellbeing through Spatial Planning' document have been incorporated into the SPD, particularly around active travel and compact neighbourhoods.</p> <p>The Respondent queries how active travel and travel planning will be monitored, along with low carbon and low emission design.</p>	<p>Support Noted.</p> <p>Agree that monitoring the effectiveness of the SPD will be important, as it will inform any review and also feed into the Core Strategy review.</p>	<p>None.</p> <p>Add two new sentences at the end of section V.8 as follows: <u>"The Council will monitor the effectiveness of Part V of the SPD through the analysis of checklists on individual planning applications. This will inform any review of the SPD."</u></p>

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		<p>The Respondent queries whether there will be an ask on applicants for the carbon footprint of developments.</p> <p>The Respondent queries whether there are any plans for carbon-neutral only developments and whether the SPD could aim for this as an ambition.</p>	<p>The SPD requires applicants to complete the checklist identifying which measures will be incorporated into developments. The SPD does not require applicants to set out the carbon footprint of their development as it is considered that there is more merit in focusing on incorporating measures into development rather than trying to quantify specific carbon footprints. The emerging Core Strategy review will likely consider the carbon impacts of development lifecycles and how best to reduce them.</p> <p>The SPD can only provide guidance in respect of existing planning policy which does not seek carbon neutral developments. This will be explored through the Core Strategy review.</p>	None.
St. Modwen Developments	General	The Respondent supports the provision of the SPD which sets out the overarching guidance on measures which can be incorporated into development to mitigate the effects and adapt to the effects of climate change.	Support Noted.	None.
Stratford Friends of the Earth	General	The Respondent considers that although the SPD is full of good intentions it is not demanding enough of developers to carry out these important measures. If the District is to meet its aim of becoming carbon neutral by 2030 all possible measures need to be taken. To do this the	The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain	None.

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		document could be strengthened by replacing the word 'should' with 'must' throughout.	<p>the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>The status of this document is as supplementary planning guidance and does not in itself set planning policies, nor can it override existing policies. The planning policies for the District are set out in the adopted Core Strategy. The Council is due to commence a review of the Core Strategy in 2020, within which climate change adaptation and mitigation will be a key consideration.</p>	
V1. How to Use this SPD				
The Inland Waterways Association (Warwickshire Branch)	V.1	The Respondent supports this section of the SPD.	Support Noted.	None.
Facilities Integration Ltd	V.1	<p>The respondent notes that the section leads with strong words and principles that expect strong actions.</p> <p>The Respondent considers that it is important to stress the independence of the Committee on Climate Change.</p> <p>In relation the reference that land use planning contributing to the transition to a low carbon future, the Respondent considers that if farming land is taken for residential use it is rarely if ever recovered. It is important to have a strong local plan</p>	<p>Comments Noted.</p> <p>Accept suggestion to clarify that the Committee on Climate Change is an independent body.</p> <p>Noted. This SPD provides guidance on the application of the Core Strategy, which does encourage the re-use of previously developed land. The Council is due to commence a review of the Core Strategy in 2020, within which</p>	<p>None.</p> <p>In the third paragraph of V.1 add the word '<u>independent</u>' before 'Committee on Climate Change'</p> <p>None.</p>

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		with real objectives. The Respondent considers that this does not currently exist as the overarching philosophy is not clear and hence there is a need for real planning in the sense of correctly balanced land use. It tends to be more abuse than use to reach fictional residential expectations without correct consideration of brown land.	climate change adaptation and mitigation is expected to be a key consideration, including in the use of land for development.	
Delta Planning	V.1	The Respondent considers that the approach outlined in the SPD is easy to interpret and will ensure that developers and applicants apply a range of mechanisms in trying to address climate change issues within the District. The process gives them choices to adapt their approach based upon different site characteristics, aspirations and finances. The checklists are a useful way to monitor progress and compliance with the SPD.	Support Noted.	None.
V2. Principle 1				
A Jonathan Horsfield	V.2	Paragraph 2 should be deleted.	Noted. However, this paragraph is important in providing an overall context.	None.
The Inland Waterways Association (Warwickshire Branch)	V.2	Support.	Noted.	None .
John Veasey	V.2	Should not just consider vehicles with internal combustion engines, electric vehicles or those with hydrogen fuel cells. Should think about other technologies which could be widely available within the next few years	Noted and agreed. Amend text.	Page 5, after 1 st para add new para: Add text: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not</u>

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		and remember that the district is assisted by local high tech motor industries such as JLR.		<u>restricted developments to only those technologies listed within it.</u>
St Joseph Homes Limited	V.2	<p>This principle is welcomed and agree fully with supporting higher densities in sustainable locations. These locations will mean fewer parking spaces requiring residents and visitors to consider more sustainable modes of travel thus improving air quality and reducing the operational carbon footprint of developments. A key mode of transport will be cycling and well-designed places with sufficient cycle storage will facilitate this.</p> <p>The promotion of density in sustainable locations is an important part of planning and it is encouraging to see reference to it at V.2.1.</p>	Noted.	None.
Network Rail - LNW	V.2	There is no reference to rail or access to rail as a sustainable mode of travel. Rail should be included as a sustainable mode of transport including consideration of parking at stations, cycle storage facilities and utilising developer contributions to mitigate the impact of proposals at stations and enhancing facilities.	Agreed. Amend to make reference to Rail as a sustainable mode of transport.	<p>Page 5, add a new paragraph after Paragraph 1:</p> <p><u>“Rail is a low carbon mode of transport and it can and will play a key role in helping to minimise the carbon impacts of transport through modal shift. Consideration should be given to enhancing cycle facilities at stations in order to help mitigate the impact from development and encourage interconnecting travel by more sustainable modes of travel.”</u></p>
Di Brennan	V.2	The SPD focuses on permeability and easy access within new developments in Stratford. This should also include and make reference to commuter and recreational transport requirements	Noted. Reference is made to public transport provision in V.2.3 Integrated Active Travel. This would include bus, tram etc. Text is also to be added to include rail.	None.

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		<p>generated by new housing developments feeding into Stratford. The group vision conflicts with the plan to funnel cars onto the major relief road passing through Stratford and a high density development. There is no bus lane and no out of town solution. Permeability should, and must explore, the use of alternative transport options such as tram, bus lanes and other forms of public transport rather than accept the 'more roads, more cars' solution provided by the South Western Relief Road. Buses and Trams are servicing major conurbations so why not Stratford?</p> <p>There is a failure to address increasing accessibility and reducing the need for private cars in relation to traffic calming into Stratford from outlying developments. Should optimise public transport and explore alternative modes of travel such as tram and train, making use of the Greenway and bus lanes rather than making more provision for cars.</p>	<p>Traffic calming is the responsibility of the County Council and is considered as part of individual planning applications.</p> <p>The South Western Relief Road is outside of the scope of the SPD as it is a strategic infrastructure project. The SPD can only expand on and provide guidance to existing planning policy contained in our Core Strategy, so it cannot comment on the South Western Relief Road or mandate the location of new development. These are issues for the Core Strategy review, which is anticipate to commence later this year.</p>	
Anna Corser	V.2	Roads should be greatly improved as well as efficient public transport to improve connectivity. There is little evidence of joined up thinking.	In terms of efficient public transport there is reference within the SPD to encouraging sustainable modes of transport. The finer detail of providing services etc is undertaken by the County Council.	None.
Stratford-on-Avon Cycle Forum	V.2	The Stratford Cycling Forum has been campaigning for many years to improve cycle facilities in and around Stratford due to the many benefits it	The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach	None.

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		<p>brings. The Cycle Forum welcomes the draft SPD, however the tone of wording throughout the document does not come across as being sufficiently robust in terms of what it is trying to achieve. Therefore, it runs the risk of only being regarded as a half-hearted effort to face up to the challenges presented by climate change. It must be made clear to developers through stronger wording that if the proposals within the document are not met then applications could be refused. The current wording of 'should' does not do this.</p>	<p>enables the most appropriate and beneficial measures to be determined on a site by site basis.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	
Bidford-on-Avon Parish Council - Clerk	V.2	<p>The Parish Council fully supports this principle 'Increasing Accessibility'. However in order to implement this it requires the following:</p> <p>Fewer large dwellings (4 and 5 bedroom houses). It is impossible to cater for the large majority of commuters by improving transport and therefore the car remains the preferred method of travel.</p> <p>Support is given to providing electric charging points throughout the district with contributions from developers.</p> <p>Improvements to cycle paths is encouraged as currently cycling can be dangerous. It is suggested looking at countries where cycling is a way of</p>	<p>Noted. Housing mix is part of the Core Strategy and is determined on level of need in an area.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered including those of housing mix.</p> <p>Whilst it is useful to look at examples from Europe, the topography of these countries can be different to the U.K. Having said</p>	None.

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		life such as Denmark and the Netherlands to ensure safe use.	that, the Council is supportive of projects to encourage cycling and there are a number of such projects identified within the Infrastructure Funding Statement that could be funded through CIL.	
Welford on Avon Parish Council	V.2	More emphasis should be given to the co-benefits of measures to reduce emissions and adapt to the impacts of climate change. E.g. reducing personal car use will have an impact on local air quality. Therefore, for non-household developments WCC should be involved in looking at cycle connectivity and other types of transport focussing on villages where there is often a lack of connectivity infrastructure and high reliance on the car.	Noted. Add text to include some wording on benefits of reducing car travel including impact on air quality and improvements to mental health and wellbeing. As already mentioned, WCC has a responsibility to look at public transport connectivity including cycling, public transport etc.	Page 5, fourth sentence, add text after 'patterns'.: <u>Air pollution is a major factor in contributing towards poor health. However by encouraging people to use more sustainable modes of transport such as public transport and by encouraging walking and cycling this can help lead to a reduction in poor air quality as well as having positive mental health and physical benefits.</u>
Stratford upon Avon Town Transport Group	V.2	Overall, the proposals do very little to robustly initiate any change in transport provision for developments and their surroundings, distinguish between residential and non-residential development. It is suggested that the wording is changed from 'should' to 'must' or 'will be' throughout the document. Connectivity is important for all new developments as well as existing developments ensuring that there are continuous cycle routes and footpaths connecting to both current infrastructure and proposed new infrastructure. There is a missed opportunity for planners to distinguish between the needs of residential and non-residential development and	The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this	Page 5, 1 st para, 7 th sentence, add following text: <u>Where possible, routes should form a coherent network linking both existing and new infrastructure to key destinations and trip origins. These networks should encourage and allow people to travel sustainably without needing to use a car.</u>

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		consideration should be given to approaches around parking layout, servicing facilities, cycle and walking facilities and public transport.	<p>year - existing policies can be reconsidered.</p> <p>It is proposed to add some text around ensuring there is a network of connectivity for both existing and new infrastructure.</p>	
Bloor Homes Western	V.2	This objective is inherently associated with the Core Strategy's approach to the distribution of new development and that in a rural district such as Stratford-upon-Avon the scope to achieve a dramatic change in travel behaviour is limited. As Stratford is the main town within the district it represents the most accessible location for new development in comparison to other smaller rural settlements, Therefore, this principle relates equally, if not more so, to the Development Plan as it does to the SPD.	Noted.	None.
Climate Change Emergency Panel Group - Stratford-upon-Avon Town Council	V.2	This principle is excellent, however in order for it to work effectively public transport will need to vastly improve with green buses and improved bus routes.	<p>Noted. Reference is made to bus stops being well connected to public transport provision and maximising the use of sustainable modes of travel. Green buses and improved bus routes would be the responsibility of the County Council.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to</p>	None.

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			the Council's Climate Change Panel.	
Sylvain Verstraeten	V.2	Introduce local currency to promote business and encourage people to buy local. Similar initiatives exist in the country with Bristol being one of the most successful. This could help to balance tourism with interest from local population and reducing reliance on online shopping.	<p>Comments noted, however the issues raised are outside the scope of the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	None.
Hallam Land Management	V.2	This objective is inherently associated with the Core Strategy's approach to the distribution of new development and that in a rural district such as Stratford-upon-Avon the scope to achieve a dramatic change in travel behaviour is limited. As Stratford is the main town within the district it represents the most accessible location for new development in comparison to other smaller rural settlements, Therefore, this principle relates equally, if not more so, to the Development Plan as it does to the SPD.	Noted.	None.
Napton Parish Council	V.2	There should be recognition within this section that planning policies relating to reducing the need for private cars also need to recognise that planning decisions need to work in tandem with investment in infrastructure to provide alternative transport.	Noted. Add some additional text to include reference to investment in infrastructure.	<p>Add text to paragraph 1. At the end of sentence 5 add:</p> <p><u>, as well as investment in infrastructure.</u></p>

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Shipston Town Council	V.2	Development should be encouraged near to employment areas where it is feasible to commute by non-car modes of travel. Consideration should be given to rural settlements where employment opportunities are limited. There should be a greater emphasis on providing reliable and frequent bus services especially in rural areas.	Noted. Add some wording to include employment sites at the start of Paragraph V.2.3. Improved bus services are the responsibility of the County Council.	Pg 6, add the following text to Paragraph V.2.3 after Development site: <u>including employment sites.</u>
V.2.1. Density and Mixed Use				
Anna Corser	V.2.1	Good ideas.	Noted.	None.
Facilities Integration Ltd	V.2.1	It is unclear as to what is being suggested. There should be clarification over the intent of this section. In surrounding villages, there has been little consideration of mixed use developments and the 10 minute walking rule. Is the 10 minute walking rule ill-considered if this is based on an ambulant walker?	Noted. This section encourages developments to be within close proximity to local facilities and not in the middle of the countryside with few facilities if any. However, there still needs to be flexibility as due to the rural nature of the district there will inevitably be areas where this may not be possible. It is felt that this section is clear in its intention. The 10 minute walking rule or 800m is taken from Manual for Streets which is good practice design guidance published by the government.	None .
The Inland Waterways Association (Warwickshire Branch)	V.2.1	Support.	Noted.	None.
St Joseph Homes Limited	V.2.1	It is agreed that sustainable and well-connected locations provide an excellent opportunity to increase density and reduce car dependency.	Noted.	None.

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Stratford-on-Avon Cycle Forum	V.2.1	<p>In order to be effective this policy should be reworded as follows:</p> <p>Density plays an important part in reducing people’s reliance on using a private car. Higher density developments can make destinations easily accessible by walking or cycling and can bring people together to support local public transport, facilities and local services. Due to Stratford District being rural in nature, an appropriate density will need to be considered for each new development to help form the context, accessibility, proposed building types, form and character of the area. Mixed use developments can provide a wide range of services and facilities including employment opportunities, schools, healthcare provision, recreational and leisure facilities, open green spaces and many more. These developments will be expected, where appropriate, to include good cycle and pedestrian access to these facilities, to be located within 10 minutes (800 m) walking distance of dwellings.</p>	<p>Agree with proposed wording changes</p>	<p>Amend first two paragraphs in V.2.1 (Density and Mixed Use) to read:</p> <p>“Density plays an important part in reducing people’s reliance on using a private car. Higher density developments can make destinations easily accessible by walking or cycling and can bring people together to support local public transport, facilities and local services. Due to Stratford District being rural in nature, an appropriate density <u>should</u> will need to be considered for each new development which will <u>to</u> help form the context, accessibility, proposed building types, form and character of the area.</p> <p>Mixed use developments can provide a wide range of services and facilities including employment opportunities, schools, healthcare provision, recreational and leisure facilities, open green spaces and many more. These developments should be encouraged <u>will be expected</u>, where appropriate and provide facilities which are to include good cycle and pedestrian access to these facilities, to be located <u>within 10 minutes (800 m) walking distance of dwellings.”</u></p>
Bloor Homes Western	V.2.1	<p>There is a tension between Core Strategy policies relating to Design, Housing Mix and Type, Countryside and Villages and the objective of increasing density in order to maximise accessibility. Consideration should be given to the design and appearance which is balanced alongside density. Design should not</p>	<p>Noted. Currently the wording of the SPD is such that all applications are still to be determined on their own individual merits but with a greater emphasis on considering climate change.</p> <p>The SPD is suggesting that mixed use development is encouraged but</p>	<p>Add a new paragraph 3 to Section V.8 (Climate Change Checklist) and amend paragraphs 4 and 5 to read:</p> <p><u>“As the evolution and use of mitigation and adaptation measures is rapidly growing across the UK, the ability for developments to respond to the impacts of climate change without compromising design</u></p>

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		<p>be used as a valid reason to object to the development where it accords with clear expectations in policies. It is agreed that mixed use developments bring the benefits of co-location of facilities and services. This form of development can only be achieved where the scale of development is significant. This principle relates more to the allocation of land for development in the Development Plan than it does to the application of the SPD in development management situations in the short term.</p>	<p>with the caveat 'where appropriate'. There is an opportunity to explore this further as part of the Core Strategy review.</p> <p>Agree that additional wording with regards design would be a useful addition to the SPD</p>	<p><u>quality is more achievable than ever. The aim is to create visually attractive sensitive development and to achieve an acceptable balance between good design and climate change measures.</u></p> <p>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. <u>Given the critical importance of ensuring that new development addresses the effects of climate change, satisfying this requirement will be given high priority when considering site specific proposals. However, it is acknowledged that proposals affecting Listed Buildings may not be able to comply and in these Case Officer discretion will be used as to what is feasible on a case-by-case basis. Guidance on how Part L (Energy Efficiency) of the Building Regulations can be applied to historic buildings is provided by Historic England in the following report: Energy Efficiency and Historic Buildings: Application of Part L of Building Regulations (2017)</u></p> <p><u>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. To assist applicants in the completion of the checklist, there are 3 separate checklists which identify the main mitigation and adaptation measures considered appropriate for that type of development."</u></p>

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Hallam Land Management	V.2.1	<p>There is a tension between Core Strategy policies relating to Design, Housing Mix and Type, Countryside and Villages and the objective of increasing density in order to maximise accessibility. Consideration should be given to the design and appearance which is balanced alongside density. Design should not be used as a valid reason to object to the development where it accords with clear expectations in policies.</p> <p>It is agreed that mixed use developments bring the benefits of co-location of facilities and services. This form of development can only be achieved where the scale of development is significant. This principle relates more to the allocation of land for development in the Development Plan than it does to the application of the SPD in development management situations in the short term.</p>	<p>Noted. Currently the wording of the SPD is such that all applications are still to be determined on their own individual merits but with a greater emphasis on considering climate change.</p> <p>The SPD is suggesting that mixed use development is encouraged but with the caveat 'where appropriate'. There is an opportunity to explore this further as part of the Core Strategy review.</p> <p>Agree that additional wording with regards design would be a useful addition to the SPD</p>	<p>Add a new paragraph 3 to Section V.8 (Climate Change Checklist) and amend paragraphs 4 and 5 to read:</p> <p><u>"As the evolution and use of mitigation and adaptation measures is rapidly growing across the UK, the ability for developments to respond to the impacts of climate change without compromising design quality is more achievable than ever. The aim is to create visually attractive sensitive development and to achieve an acceptable balance between good design and climate change measures.</u></p> <p>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. Given the critical importance of ensuring that new development addresses the effects of climate change, satisfying this requirement will be given high priority when considering site specific proposals. However, it is acknowledged that proposals affecting Listed Buildings may not be able to comply and in these Case Officer discretion will be used as to what is feasible on a case-by-case basis. Guidance on how Part L (Energy Efficiency) of the Building Regulations can be applied to historic buildings is provided by Historic England in the following report: Energy Efficiency and Historic Buildings: Application of Part L of Building Regulations (2017)</p>

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				<p>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. To assist applicants in the completion of the checklist, there are 3 separate checklists which identify the main mitigation and adaptation measures considered appropriate for that type of development.”</p>
Clare Charlton	V.2.1	<p>Where reference is made to encouraging developments to be within a 10 minute walking distance of facilities, a distance should be added for cycling as well. It is suggested that SHAPE Atlas is used as a guide.</p>	<p>This distance is taken from Manual for Streets good practice design guidance written by the government and based on the concept of a 'walkable neighbourhood'. There isn't any guidance currently on what would be a suitable distance for being able to cycle to facilities. However, if 10 minutes is considered an appropriate distance for walking this could also apply to cycling. Add cycling to the sentence.</p>	<p>Page 5, add the following text to V.2.1, paragraph 2 after walking:</p> <p><u>and cycling.</u></p>
V.2.2. Walkability/Permeability				
Anna Corser	V.2.2	Good ideas.	Comments Noted.	None.
Stratford-on-Avon Cycle Forum	V.2.2	<p>In order to be effective this policy should be reworded as follows:</p> <p>New developments will be expected to provide active frontages that are directly accessible by foot and overlooked from the street. This can help in reducing crime by providing natural surveillance and ensuring streets are community friendly which in turn encourages walking and social interaction. Developments will also need to provide permeable networks</p>	<p>The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. As such it is not considered appropriate to amend the wording to make the requirements mandatory.</p>	None.

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		<p>to encourage walking and cycling and make places easy to navigate especially by visitors. Signage will also be required on all new developments to show the main pedestrian and cycling routes to village centres and key facilities and to make it easy for pedestrians and cyclists to find their way through new developments. Signage should be clear and include the distance to key facilities and approximate timings to encourage and promote walking and cycling. Consideration should be given to providing seating/resting places along well used routes to assist less mobile persons to reach key facilities.</p>	<p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	
Bloor Homes Western	V.2.2	<p>It is agreed that the objective of achieving permeable networks encourages walking and cycling. This is equally as applicable to existing built environs beyond a site's boundary where in the past such principles have not been afforded the same priority. Investment in signage is a relatively low cost measure that can contribute towards more journeys on foot or by cycle.</p> <p>Integrated travel relies upon measures and initiatives that are beyond individual sites and requires public sector investment to maximise the potential of sustainable modes of travel.</p>	Noted.	None.
Hallam Land Management	V.2.2	<p>It is agreed that the objective of achieving permeable networks encourages walking and cycling. This</p>	Noted.	None.

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		<p>is equally as applicable to existing built environs beyond a site's boundary where in the past such principles have not been afforded the same priority. Investment in signage is a relatively low cost measure that can contribute towards more journeys on foot or by cycle.</p> <p>Integrated travel relies upon measures and initiatives that are beyond individual sites and requires public sector investment to maximise the potential of sustainable modes of travel.</p>		
Warwickshire Wildlife Trust	V.2.2	<p>Direct reference to the greening of pedestrian and cycle routes to help deliver against biodiversity targets whilst also enabling users to gain health benefits should be included in this section. Linear routes for pedestrian movement can also provide opportunities for wildlife corridors. There should be more of a holistic approach here to enable small scale developments which come forward at different times within a wider allocation link to provide continuity of infrastructure, e.g a cycle path created in one part of a development is designed so that it can be added to in future phases of development coming forward.</p>	<p>Noted. Agree that there should be reference to greening/blueing of pedestrian and cycle routes as well as ensuring that there is a network of cycle paths and walking routes available.</p>	<p>Page 6, V.2.2, Walking/permeability. Add the following new paragraphs:</p> <p><u>Cycle and walking routes should become green/blue corridors to encourage wildlife and habitats as well as making these routes more attractive. This could also include tree lined streets.</u></p> <p><u>Where possible, routes should form a coherent network linking both existing and new infrastructure to key destinations and trip origins. These networks will allow people to travel sustainably without needing to use a car.</u></p> <p>Page 37, V.7.2, Local Wildlife Nodes and Blue/Green Corridors. Add new sentences to end of first paragraph:</p> <p><u>Where walking and cycling routes are proposed, these should integrate green/blue infrastructure. Blue/green</u></p>

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				infrastructure can have multiple benefits, including flood management provision, the encouragement of biodiversity and the lowering of local temperatures.
A Jonathan Horsfield	V.2.2	Consideration should be given to tree lined streets.	Noted. Add text to new paragraph under V.2.2.	Pg 6, V.2.2, add following text to new paragraph : <u>"This could also include tree lined streets."</u>
The Inland Waterways Association (Warwickshire Branch)	V.2.2	Support.	Noted.	None.
Clare Charlton	V.2.2	Cul de sac design should always incorporate walking/cycling routes between the end of cul de sacs to address natural desire lines and reduce walking and cycling distances.	Noted. However, as set out in the Development Requirements SPD Part C: Access and Connectivity, cul-de-sac developments are not generally considered to be good examples of design and should be avoided. The SPD primarily focuses on new developments and not retrofitting existing.	None.
Canal and River Trust	V.2.2	<p>This section should also cover canal towpaths. The natural surveillance from developments to such routes is important in order for people to feel safe. Should consider the potential for reducing litter as this has been linked to a higher anticipation of incivilities and perception of higher crime prevalence.</p> <p>The Canal & River Trust welcome the encouragement of signage to show the main pedestrian and cycling routes.</p>	<p>Whilst specific reference is not given to canal towpaths, it is considered that this would be covered by walking routes.</p> <p>Reducing litter is outside of the remit of this document, however there could be reference to developments providing litter bins along walking routes.</p>	Page 6, 1 st para, add text to final sentence after 'key facilities to read: <u>and litter bins in order to prevent litter and ensure that these routes remain attractive.</u>

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V.2.3. Integrated Active Travel				
Highways England	V.2.3	<p>Highways England supports the proposal to minimise the need to travel and maximise the use of sustainable modes of transport. However, the section focusses on walking and cycling with little mention of other forms of public transport such as bus, rail, car sharing, car clubs, park and ride and other options. The text should be expanded to cover these options.</p> <p>Travel plans for residential use should be explored as currently they are only supported by WCC for employment and service sites. They can be a useful tool enabling the developer to understand promote a sustainable travel environment. They can also be useful in creating new communities within new developments. Communities coming together can help to achieve targets set out in the travel plans and identify appropriate measures to support the communities use of sustainable transport removing the reliance on car based trips. This can be further supported by a developer contribution to deliver personalised travel planning for new development sites.</p>	<p>Noted. Add text to expand on alternative sustainable modes of transport.</p> <p>Policy CS.26 in the Core Strategy supports the use of Travel Plans and therefore text will be amended to include reference to this.</p>	<p>Page 6, Add new 2nd paragraph to read:</p> <p><u>"Sustainable modes of transport including the introduction of car clubs, car sharing opportunities, park and ride facilities and rail will all be supported. In accordance with Core Strategy Policy CS.26 travel plans should be provided on relevant developments to mitigate unacceptable transport impacts which directly arise from the development in order to promote sustainable travel patterns for work and education related trips."</u></p>
Sylvain Verstraeten	V.2.3	<p>Stratford-upon-Avon should consider becoming a pedestrian zone.</p> <p>Create a taxi – bus terminal.</p>	<p>These ideas are all noted. The County Council are responsible for implementing specific projects and measures such as these through their Local Transport Plan and specific district/borough strategies</p>	<p>None.</p>

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		<p>Create a one-way ring road system around the town to cope with through traffic.</p> <p>Create safe link between the station and town centre.</p> <p>Resurface the Greenway which currently is unsafe with a road bike in winter. It is good to see that reference has been made to the Greenway in case study 3 but monitoring the success of these kinds of works and take actions. The Greenway from a personal experience is used exclusively for recreational purposes and not as a way of transport.</p> <p>Improvements should be made to existing cycleway routes (cycle paths, markings, appropriate speed limit)</p> <p>Convert disused railway line to additional Greenways, to Bidford and Kineton.</p> <p>Additional links should be created as follows:</p> <p>Welford – Greenway Stratford – Hatton Rock – Sherbourne Hunscombe Lane</p>	<p>within this. The SPD highlights the importance of providing a wide range of sustainable transport options and encouraging these for new developments.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues and the comments made by the respondent will be passed on to the Council’s Climate Change Panel.</p>	
Clare Charlton	V.2.3	If the National Design Guide is to be followed it should be explicit within this section.	The National Design guide forms part of the government’s national planning policy guidance.	Amend paragraph 4 of V.2.3 to read: “ The National Design Guide (Oct. 2019) forms part of the government’s national planning practice guidance and identifies

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
			Reference will be made within the text of the SPD to clarify this.	'movement' as one of ten characteristics of well-designed places, and highlights the need for an integrated network for all modes of transport giving people maximum choice in how to make their journeys, prioritising pedestrians and cyclists."
Facilities Integration Ltd	V.2.3	The use of the word 'should' is not strong enough. Suggest using 'must' or 'are to' instead.	<p>The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. As such it is not considered appropriate to amend the wording to make the requirements mandatory.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	None.
A Jonathan Horsfield	V.2.3	Well connected should be defined. Cycling and walking routes which are connected to public transport should end with bus shelters and lockable covered cycle racks to make them work.	Noted. It is felt that 'well connected' is adequately explained within its context. Bus shelters and lockable covered cycle racks are beyond the scope of this document, however reference is made to developer contributions for facilities	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
			<p>specific to developments in the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	
Stratford-on-Avon Cycle Forum	V.2.3	<p>In order to be effective this policy should be reworded as follows:</p> <p>Development will generally be directed to areas that minimise the need to travel and maximise the use of sustainable modes of transport, with walking and cycling actively promoted to and from the development site, in particular, within Stratford, linking with cycle provision, either existing or proposed, as shown on Warwickshire's draft cycle plan of February 2017. This will ensure that key facilities such as schools, shops, GP surgeries, railway stations and bus stops are well connected by walking, cycling or public transport provision. Cycling and walking provision will be expected to include suitable crossing facilities where necessary as well as appropriate lighting levels and security measures to ensure the safety and security of pedestrians and cyclists. When considering the provision of pedestrian and cycling</p>	<p>Noted. It is important to note that this is not a policy and that the main purpose of this document is to provide further detailed information on the policies within the Core Strategy. Therefore, the current wording within the SPD has to follow the wording within the Core Strategy and is not able to go above and beyond. However, once the review of the Core Strategy is undertaken the strength of the wording surrounding the policies will be considered.</p> <p>It is understood that the Warwickshire Cycle Plan was never finalised and is not available online so it is not considered appropriate to make reference to this within the text.</p>	No further action.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		<p>routes and facilities these should be designed for all users including elderly and disabled residents and linked closely with the 'Safe Routes to Schools' initiative. Where there is existing pedestrian/cycling provision, developers will need to consider whether it will be sufficient to cater for an increased use taking into consideration existing and future links to public transport. These will need to be improved where appropriate.</p>		
The Inland Waterways Association (Warwickshire Branch)	V.2.3	Support	Noted.	None.
Canal and River Trust	V.2.3	<p>It is welcoming to see reference to existing pedestrian/cycling provision especially around developments considering whether it is suitable for its proposed use and that they should be improved where appropriate.</p> <p>The document should highlight that new developments link to existing routes to create a network.</p>	Noted and agreed. Text has been added to this effect.	<p>Page 6, V.2.2, Walking/permeability. Add the following new paragraph:</p> <p><u>Where possible, routes should form a coherent network linking key destinations and trip origins. These networks will allow people to travel sustainably without needing to use a car.</u></p>
V.2.4. Cycling				
Stratford-on-Avon Cycle Forum	V.2.4	<p>In order to be effective this policy should be reworded as follows:</p> <p>Cycle storage must be provided for each new dwelling at an appropriate level as well as on new employment, leisure, retail and commercial development sites. This should be secured, covered, have good surveillance and be sited</p>	Agreed with proposed text changes	<p>Amend paragraph 1 of V.2.4 (Cycling) to read:</p> <p>"Cycle storage must be provided for each new dwelling at an appropriate level as well as on new employment, leisure, retail and commercial development sites. This should be secured, covered, have good surveillance and be convenient to use sited conveniently. Therefore,</p>

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		<p>conveniently. Therefore, consideration will need to be given to the overall design of cycle storage at an early stage of the planning process and full details of this including the location, type of storage, spacing, numbers, method of installation and accessibility to the storage should be provided with the planning application. Cycle storage provision will also be required in householder proposals where additional bedrooms, are proposed and where sufficient site area is available. Consideration should be given to electric charging points for e-bikes on new developments as well as grouped locations for cycle hire. This would need to be considered on a case by case basis as it will be dependent on the size of development.</p>		<p>consideration should <u>will need to</u> be given to the overall design of cycle storage at an early stage of the planning process and full details of this including the location, type of storage, spacing, numbers, method of installation and accessibility to the storage should be provided with the planning application."</p>
Clare Charlton	V.2.4	<p>"Cycle storage must be provided for each new dwelling an appropriate level as well as on new employment, leisure, retail and commercial development sites". This statement is ambiguous – does this level mean height above the ground or quantity? It is suggested that cycle parking is provided equal to the number of bedrooms plus 1. E.g. 3 bedroom house should provide cycle parking for 4 cycles.</p> <p>Garages should be designed for cycle storage rather than for cars, smaller but with appropriate storage devices and easy to access. Storage for</p>	<p>Noted and agreed. Amend text to remove 'level' and replace with 'amount'.</p> <p>Cycle parking requirements and design is set out within Part O of the SPD and a cross reference is</p>	<p>Pg 6, add text to beginning of paragraph 1 (V.2.4). <u>An appropriate amount of.</u></p> <p>Pg 6 1st sentence, Delete the following after 'dwelling'. At an appropriate level.</p> <p>None.</p>

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		community cycle parking and visitors should meet the criteria as set out in the SPD. Wording regarding e-bikes should be changed to read 'All new developments must provide charging points for e-bikes'.	provided within section v.2.4. This is considered sufficient.	
Facilities Integration Ltd	V.2.4	Although there is reference to 'must' in this section all wording should be 'must' and not revert back to 'should'.	<p>The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. As such it is not considered appropriate to amend the wording to make the requirements mandatory.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	None.
John Veasey	V.2.4	It is a good idea to encourage walking and cycling, however it should be noted that this level of activity is not practical for everybody. Therefore, homes need to be built for all ages and capabilities.	Noted. However, by encouraging walking and cycling it does not mean others are at a disadvantage.	None.
Tom Smerdon	V.2.4	There should be a cycle network e.g. a cycle path linking the tramway over	Noted. Wording has been added to make reference to 'networks'.	Pg 6, V.2.2, Walking/permeability. Add the following new paragraph:

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		the pedestrian bridge and into Stratford.		<u>Where possible, routes should form a coherent network linking key destinations and trip origins. These networks will allow people to travel sustainably without needing to use a car.</u>
Delta Planning	V.2.4	The methods outlined to increase accessibility such as higher density development in accessibly locations and encouraging cycling and walking is supported. The SPD should acknowledge that specific details of cycle storage can be agreed through conditions as long as a suitable area or space is provided.	Noted. Add text to provide some clarity.	Pagg 7, V.2.4, Add following text at end of last paragraph: <u>Specific details of cycle storage relating to individual sites can be agreed through conditions.</u>
The Inland Waterways Association (Warwickshire Branch)	V.2.4	Support.	Noted.	None.
A Jonathan Horsfield	V.2.4	Pleased to see the words 'must be provided'. Paragraph 3 should read 'bedroom' and not 'bedrooms'.	Noted. Disagree, wording does not need amending.	None.
Stratford upon Avon Town Transport Group	V.2.4	This section goes too far with needs for bike storage sheds and charge points for developments. It would be pragmatic to have bikes stored within properties to avoid predictable vandalism, maintenance and safety issues apart from on high rise buildings.	Cycle parking requirements are set out in detail in adopted Part O of the SPD and section V.2.4 is consistent with these requirements. This can include the storage of bikes within properties, where appropriate.	None.
V.2.5 Planning for the Car				
Anna Corser	V.2.5	Electric vehicle charging is very important and small villages should be included.	Electric vehicle charging applies to all new developments regardless of whether they are in small villages or towns.	None.

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The Inland Waterways Association (Warwickshire Branch)	V.2.5	Support.	Noted.	None.
Stratford-on-Avon Cycle Forum	V.2.5	<p>In order to be effective this policy should be amended as follows:</p> <p>Policy CS15 of the Core Strategy prioritises development firstly within the main town of Stratford-upon-Avon and then concurrently through the remaining locations identified in the settlement hierarchy. This remains the principle mechanism for addressing Climate Change in SDC's planning policy through the delivery of sustainable development and the promotion of linked trips through improved facilities for walking, cycling and public transport leading to reduced reliance on the private car.</p> <p>Developments which do not provide residential parking could be considered where the following apply:</p> <p>Extension, alteration or re-use of an existing building with no access to parking Reversion of a previously converted property to its original residential use, including flats above the shops. Where 100% cycling or walking provision is considered to be a viable option; Highly sustainable locations within a 10 minute walk (800m) of a</p>	Agree to amend text of section v.2.5	<p>Amend the first paragraph of section v.2.5 (Planning for the Car) to read:</p> <p>"Policy CS15 of the Core Strategy prioritises development firstly within the main town of Stratford-upon-Avon and then concurrently through the remaining locations identified in the settlement hierarchy. This remains the principle mechanism for addressing Climate Change in SDC's planning policy through the delivery of sustainable development and the promotion of linked trips <u>through improved facilities for walking, cycling and public transport leading to</u> and reduced reliance on the private car.</p>

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		<p>full range of services, facilities and frequent public transport services.</p> <p>Consideration should be given to good design and layout in order to accommodate visitor parking and communal parking. Where there are communal parking areas these should be broken up by planting where possible to improve the design and layout, help to improve biodiversity and assist with surface water drainage.</p> <p>Development plans will be expected to prioritise the creation of streets that control the speed of vehicles using appropriate traffic calming measures. For residential streets, one of the main objectives should be to achieve a maximum design speed of 20mph, which SDC, working with WCC Highways, will be seeking to make mandatory.</p> <p>Working closely with WCC Highways, SDC will actively seek to establish 'idle-free zones' (defined areas where vehicles are banned from running engines whilst stationary) outside sensitive drop-off sites such as schools, hospitals and GP surgeries in order to reduce air pollution and carbon emissions caused by idling vehicles.</p>		

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Highways England	V.2.5	<p>This section is very heavily focussed on the private car and could be expanded to include low carbon fuels for delivery vehicles, public transport vehicles and service vehicles such as refuse vehicles within development sites.</p> <p>Electric Vehicle Charging Highways England supports the use of low carbon fuels, but considers that the text could be developed further to support other alternatives to petrol based fuels and electric vehicles.</p> <p>Consideration should be given to future proofing parking provision to accommodate low carbon fuels, which could include putting in place the ducting in preparation for the upgrading to an electric charging point as demand dictates.</p>	<p>This is beyond the scope of the SPD. It would not be possible to enforce businesses to use low carbon fuels for their vehicles. The SPD can encourage businesses to provide the infrastructure in order for them to use these.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p> <p>Part R of the SPD (Air Quality) sets out the standards for electric charging point provision and this includes future proofing through appropriate cabling. A cross-reference to Part R of the SPD is provided within section v.2.5 which is considered to be sufficient.</p>	<p>None.</p> <p>None.</p>
IM Land	V.2.5	<p>Electric Vehicle Charging. The provision of electric charging points is supported, however wording is unclear and clarification is required. It is recommended that the requirement be updated to allow for consideration of the results of the Government's consultation into residential and non-residential EV charging carried out last year, the results of which are anticipated this year.</p>	<p>Noted. However, due to the timing of needing to progress the SPD and not having a definitive timescale of when the government will publish their results it is not possible to align these currently. This is something that will be taken forward as part of the forthcoming Core Strategy review by which time the results will hopefully be available.</p>	<p>None</p>

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		<p>The requirements for electric charging points in the SPD differ from those in the Government's draft document. It is recommended that the SPD aligns with the Government's plans. In addition to this it is recommended that greater detail is provided on potential trigger points for the potential phasing and further detail of trigger points for installation of charge points, linked to local demand.</p> <p>Consideration should be given to the technical feasibility of providing EV charging points where there is dedicated on-street car parking. It is suggested that charging points are only suitable where off-street parking is provided.</p>		
Bloor Homes Western	V.2.5	<p>It is agreed that car free developments will only be appropriate in certain circumstances and is unlikely to be prevalent in Stratford. Therefore, it is important to maximise measures to limit the need to travel by car.</p> <p>However, in achieving permeable networks, active travel and car free developments the location of development is pre-eminent in the first instance.</p> <p>It is agreed that electric vehicle charging points is an important element of future proofing new development. However, there are practical issues arising from the</p>	<p>Noted. This is acknowledged within section v.2.5</p> <p>The standards for electric charging point provision is set out within adopted Part R of the SPD (Air Quality) which addresses the comments made. A cross-reference</p>	<p>None.</p> <p>None.</p>

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		<p>various different options available to consumers in terms of speed of charging and therefore consumer choice is of paramount consideration. Therefore, the optimum position for the developer to install the necessary unit and cabling within the building which is connected to a weatherproof socket on an external wall. This would then permit installation of a charging unit by the house purchaser leading to future proofing of development, facilitating consumer choice and avoiding retro-fitting. Where there is unallocated parking, or in the instance of flatted development, a flexible approach would be required in comparison to a conventional house with on plot parking.</p>	<p>to Part R is provided within section V.2.5 which is considered sufficient.</p>	
<p>Climate Change Emergency Panel Group - Stratford-upon-Avon Town Council</p>	<p>V.2.5</p>	<p>It would be useful to have maps/information on areas in the District that can be viewed as having the potential to enable car free planning and those that don't.</p> <p>The Town Council is interested in working with the District to map out the areas in Stratford where work is needed to encourage car journey reduction.</p> <p>Idle free zones are supported, however further information on how these will be monitored and regulated is required.</p>	<p>The SPD currently includes a number of indicators which suggest areas in which car free developments may be suitable.</p> <p>It is not possible to map these at the present time, however this may be something that can be considered as part of the Core Strategy review. The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	<p>None.</p>

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Hallam Land Management	V.2.5	<p>It is agreed that car free developments will only be appropriate in certain circumstances and is unlikely to be prevalent in Stratford. Therefore, it is important to maximise measures to limit the need to travel by car.</p> <p>However, in achieving permeable networks, active travel and car free developments the location of development is pre-eminent in the first instance.</p> <p>It is agreed that electric vehicle charging points is an important element of future proofing new development. However, there are practical issues arising from the various different options available to consumers in terms of speed of charging and therefore consumer choice is of paramount consideration. Therefore, the optimum position for the developer to install the necessary unit and cabling within the building which is connected to a weatherproof socket on an external wall. This would then permit installation of a charging unit by the house purchaser leading to future proofing of development, facilitating consumer choice and avoiding retro-fitting. Where there is unallocated parking, or in the instance of flat development, a flexible approach would be required in comparison to a conventional house with on plot parking.</p>	<p>Noted. This is acknowledged within section v.2.5</p> <p>The standards for electric charging point provision is set out within adopted Part R of the SPD (Air Quality) which addresses the comments made. A cross-reference to Part R is provided within section V.2.5 which is considered sufficient.</p>	<p>None.</p> <p>None.</p>

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Clare Charlton	V.2.5	<p>Developments should aim to create streets that control the speed of vehicles using appropriate traffic calming measures. For residential streets, one of the main objectives should be to achieve a maximum design speed of 20mph. Is traffic calming different to street design? Street design should be used to reduce speeds. Should consider adding some wording to say 'residential developments and roads near schools will have maximum speeds of 20mph. Is it possible to include designing schools that can only be accessed by foot and cycle allowing for staff access by car if needed.</p> <p>5% of initial electric charging provision is not sufficient and is underestimating future need. Research should be undertaken to look in to current and future expected levels of electric vehicle sales.</p>	<p>There is reference in the SPD to design speeds of 20mph.</p> <p>Enforcing and changing the speed limit of roads is the responsibility of the County Council.</p> <p>The SPD encourages the use of developments to be well connected to facilities by sustainable modes of transport, however it would not be feasible to design schools only allowing access by foot and cycle. The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p> <p>The current text regarding electric charging provision within the SPD is not able to go above and beyond the policies within the Core Strategy, however it will be considered as part of the forthcoming Core Strategy review.</p>	None.
Facilities Integration Ltd)	V.2.5	<p>Weakly worded. A definition is required for the use of words 'where sufficient' and 'consideration'.</p> <p>This section does not take into account the government policy of expecting all vehicles to be electric in 15 years. Thought should be given to the provision of electric charging</p>	<p>The wording follows that of the Core Strategy.</p> <p>This will form part of the forthcoming Core Strategy review. The SPD is not able to go above and beyond the wording in the Core Strategy.</p>	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		points in rural areas where a number of houses do not have garages or direct access to roads/streets and pavements. There should be a radical re-think on the provision of charging points.		
John Veasey	V.2.5	People will want and need personal transport and it is illogical that this should be done away with where we have an ageing population and those who may not be able to walk or cycle to facilities. Greater consideration should be given to electric vehicles especially given that autonomous vehicles are likely to be commonplace. There should be less focus on vehicles with internal combustion engines.	<p>The SPD does not state that personal transport should be done away with.</p> <p>There is a section on electric vehicles in the current SPD.</p>	None.
Tom Smerdon	V.2.5	Need to acknowledge that Stratford is a commuter town. There should be more EV charging infrastructure available within the town and the council should be leading by example and exploring grants that are available. There are good examples of EV towns, e.g Dundee where free charging is universal.	<p>Comments noted, however the issues raised regarding the provision of public charging points are outside the scope of the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	None.
Delta Planning	V.2.5	It is questioned as to whether any development can truly be car free as there is no way of controlling private car ownership.	The SPD promotes car free developments but only in specific areas where a number of criteria may apply. Each application will be determined on their own individual	None.

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		<p>The lack of any car parking provision serving a development can lead to pressure for on-road car parking, where often in the most densely developed more central town and city locations, this is limited and contentious.</p> <p>Electric Vehicle Charging The required electric car parking units is duplicated in Part R of the Developer Requirements SPD: Air Quality. It should be made clear that one charging unit should be applicable per allocated space, and exclude visitor and non-allocated general parking bays.</p>	<p>merits and car parking would be a consideration.</p> <p>In terms of visitor parking and communal parking the SPD still references that consideration should be given to this but suggests ways in which this could be more environmentally friendly.</p> <p>The wording should stay as it is as it would be difficult to define an allocated space. E.g. some dwellings may have a drive that would take two vehicles. Would the dwelling require two charging points?</p> <p>It is too restrictive to exclude visitor and non-allocated general parking bays as some developers may wish to provide this. There still needs to be a degree of flexibility.</p>	
Councillor Nigel Rock	V.2.5	<p>Although it is correct to encourage mixed use schemes to provide services close to dwellings and to provide dwellings near to employment, community facilities and shops this is not always feasible. Large and intermediate housing developments should be required to analyse and if appropriate apply a sequential test such that locations minimise car use. There should be a presumption against developments that are not located near to employment sites, schools,</p>	<p>Each planning application will still need to be determined on its individual merit and therefore mixed use and suitability will be taken into account depending on the type of development.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy.</p>	None.

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		<p>community resource, affordable housing schemes which are not near demand for such schemes and out of town retail centres requiring the use of a private car.</p> <p>Support is given to idle zones and this could be more specific to schools and convenience stores.</p> <p>Electric Vehicle Charging Points Support is given to this section but also add wording offering general support for installation of EV points as this could provide extra weight in planning decisions for example, retro fitting homes or businesses.</p>	<p>However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p> <p>There is already reference to schools. Agree to amend text to include shops.</p> <p>The provision of EV charging points is included within each of the checklists as a possible measure including the checklist for householder developments.</p>	<p>Page 7, V.2.5, add text to paragraph 5 after 'schools' :</p> <p><u>, shops</u></p> <p>None.</p>
Dr R J Tucker	V.2.5	<p>Electric Vehicle Charging. Clarification required over what is meant by a unit. Does it mean one household or one estate? It would be difficult to provide EV charging points for every property in Stratford due to some being terraced houses, apartments etc. Consideration should be given to installing a network of metered kerbside sockets for charging. This could be funded through community schemes with costs shared across users but it would require co-ordination of SDC. Encouraging EV use can offer significant air quality benefits in addition to reduced carbon emissions. There is concern over how the energy</p>	<p>Noted, however current wording in adopted Part R of the SPD (Air Quality) refers to 'unit' and to ensure that there isn't confusion or misinterpretation and to maintain consistency it is suggested keeping the wording as 'unit'. However, this is something that can be looked at as part of the Core Strategy Review in terms of making the wording clearer.</p> <p>Part R of the Air Quality SPD provides further information on electric vehicle charging points of which there is reference to in the SPD.</p>	None.

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		is going to be generated for electric vehicles.	The provision of publically available charging points in communal spaces in outside the scope of the SPD. The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.	
David Pashley	V.2.5	<p>Some of the car related aspects are out of date. There is no distinction between an Internal Combustion Engine Vehicle and Battery Electric Vehicle (BEV) and there is an assumption that all forms of car contribute to pollution which is broadly correct but needs to be addressed thoughtfully in a forward thinking document. Policy should be seen as an opportunity to encourage adoption of BEV's where possible. The percentages and number of electric unit charging points suggested is rather low in light of 2035 targets. The trigger level should be suggested.</p> <p>Provision of a 16A charging supply for a 1-3 bed property are considered to be inadequate as they are insufficient for overnight charging. 32A should always be provided where possible.</p> <p>Need to consider rapid charging commercial considerations. May need to consider maximum allowed pricing</p>	<p>Text to encourage new and emerging technologies.</p> <p>Part R of the Air Quality SPD (adopted in 2019) provides further information on electric vehicle charging points of which there is reference to in the SPD. These ae minimum requirements and higher specifications can be provided where appropriate.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	<p>Pg 5, after 1st para add new para:</p> <p>Add text:</p> <p><u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not restricted to only those technologies within it."</u></p>

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		<p>when granting planning permission. Electric Vehicle Charging Points may not result in equitable EVCP availability.</p> <p>A high proportion of residents live in homes without a private driveway. SDC clearly addresses developments with dedicated parking but lacks clarity when addressing the need for on street charging. The following text is incorrect "Where on-street parking is proposed, ECVP's may be provided through a community hub set up, where multiple rapid charge points are provided locally for the community". Residents without private driveways need access to reasonably priced overnight Fast Charging, not Rapid Charging. Fast charging is the way forward for residential demand. Overnight charging should be provided close to the BEV driver's residence, and the idea of hubs in this context is questionable.</p>		
J A Nixon	V.2.5	<p>An efficient, cheap park and ride service is required for Stratford in order to reduce traffic. The system in Oxford works well and this should be looked at, parking charges at the park and ride should be cheap. There should be regular buses which are clean and cheap and adequate facilities at the park and ride such as toilets, coffee machines etc.</p>	<p>There is already an existing park and ride facility for Stratford. This is an area of responsibility for the County Council, although the District Council will work in close partnership with the County Council when looking at these types of facilities and implementing the transport strategies from the Local Transport Plan.</p>	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		<p>Residential areas should provide resident only parking and it should not be available to everyone.</p> <p>Electric car charging points should be a requirement for all new developments and need to be installed around the town now.</p> <p>Public transport needs to be improved in terms of quantity and cost. There should be cycle routes and safe bike parking areas.</p>	<p>Improvements to existing public transport services, parking and EV provision is the remit of the County Council, however the District Council will work closely to ensure that there is a well thought out co-ordinated approach. Cycle and storage is covered in the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	
William Davis Ltd	V.2.5	<p>The purpose of an SPD is to further detail to existing policy and not introduce anything new. The Core Strategy states (Policy CS26) that the council will encourage the provision of electric charging points, however the SPD is requesting specific provision of charging points i.e. one charging point per unit. This level of detail should be removed from the SPD.</p> <p>The implementation of Electric Vehicle Charging Points is considered to be complex with varying different charging sockets available and no standardised format. Therefore, it is considered appropriate for a developer to install a suitable feed and spur to the point of charging which would then allow the</p>	<p>The District Council does not feel that this is creating new policy as it is already set out in Part R of the Development Requirements SPD which is providing more detail to the Core Strategy policies.</p> <p>Part R of the SPD is cross-referenced within section v.2.5 and provides detail on the specification required for electric charging points for different types of developments.</p>	None.

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		<p>homeowner to decide on which ECVP charger to install. It should also be noted that until technology advances, EVCP's will not be achievable on all new dwellings.</p> <p>It should be noted that the installation of charging point hardware will also have implications on the local electricity network.</p> <p>Should consider results of Government consultation undertaken last year (2019) expected to be published in 2020 so as to ensure that any information included in the SPD does not become immediately out of date or considered unfeasible or unviable.</p>	<p>Due to the timing of needing to progress the SPD and not having a definitive timescale of when the government will publish their results it is not possible to align these currently. This is something that will be taken forward as part of the forthcoming Core Strategy review by which time the results will hopefully be available.</p>	
Bourne Leisure	V.2.5	<p>As currently drafted, the SPD is unclear as to what is included in the "commercial" development category. Clarification is required over what uses fall within 'commercial' category for electric vehicles and confirmation is sought that tourism and leisure does not fall into this category.</p> <p>The SPD should be more flexible with its approach to the provision of electrical charging points for tourism and leisure uses. It should take into account the nature and location of this kind of development which constrains the number of charging points that can be accommodated on site and be</p>	<p>Commercial use is any use that is for business use. The expectation would be that the 10% provision does apply to leisure and tourism. This is to encourage and promote electric vehicle use.</p> <p>Each planning application would still be determined on its individual merits taking into account, nature of use and location.</p>	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		supported by the local electricity network. EV standards within the SPD should be used as a guide for developers and assessed on a case by case basis.		
St Joseph Homes Limited	V.2.5	<p>The ethos of V2.5 is supported. The Council's ambition to provide access to vehicle charging points for residential developments is supported in principle. Proposals for each site should be tailored to its context and there should be flexibility to allow for different parking regimes in higher density developments, technology changes or advances and customer choice. Need to consider viability and level of provision for higher density developments in sustainable locations where energy infrastructure costs can be higher. On higher density apartment buildings, having a one to one ratio for EV charging points has the potential to overprovide infrastructure due to advances in technologies. Suggest altering wording to reflect this to:</p> <p><i>"At least one passive electric vehicle charging point per dwellinghouse and access to communal charging facilities should be provided for apartments".</i></p> <p>The requirement should allow for the provision of passive chargepoints for individual dwellings. This provides flexibility to the end user and reduces the possibility of unused charging points. It is recommended that the</p>	<p>The requirements for electric charging provision is set out with Part R (Air Quality of the SPD) which was adopted in 2019 and sets out the different requirements for different types of development including residential development with and without dedicated parking. Part R of the SPD is cross-referenced within Section v.2.5 and this is considered to be sufficient, and avoid the needs to duplicate guidance that is provided elsewhere.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	None.

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		<p>council adopt a position that requires all new dwellings to contain passive charging making it ready for an electric charging point. For high density apartment buildings, it is recommended that each home has access to active charging points. Concern is expressed over the current wording suggesting that 100% provision would be required as this could have viability implications on projects of all scales due to associated costs. Therefore, V.2.5 does not comply with NPPF Paragraph 16 (b) as it has not been positively prepared and is not deliverable from a commercial perspective. There is also the possibility of over providing infrastructure in communal parking areas that may ultimately become redundant. This is unusual and does not align with the Development Requirements Part R: Air Quality.</p> <p>The Council should reconsider its position regarding 100% provision of active charging, taking into account both the viability implications and the merits of passive charging points in terms of end user flexibility and avoidance of overprovision.</p>	<p>Agree. Amend text to ensure consistency with the EV charging requirements set out within Part R of the SPD</p>	<p>Amend the first paragraph of the Electric Vehicle Charging Section in v.2.5 to read:</p> <p>"At least one electric vehicle charging point per unit should be provided for residential developments <u>with dedicated parking or 1 charging point per 10 spaces where there is unallocated parking.</u> For and for commercial, retail and industrial at least 10% of parking spaces <u>should have electric charging points.</u> These may be phased with 5% of initial provision and the remainder being provided at an agreed trigger level."</p>
A Jonathan Horsfield	V.2.5	<p>Paragraph 5 should include 'outside shops' in the list of idling zone projects. EV charging infrastructure is critical for future transport needs. Retrofitting will be vastly expensive. Consideration should be given as to whether charging points should be</p>	<p>Noted and agree to add 'shops'.</p> <p>The specification for EV charging points for different types of development is set out within adopted Part R (Air Quality) of the SPD. It is important to note that</p>	<p>Pg 7, V.2.5, add text to paragraph 5 after 'schools'</p> <p>Add text to paragraph 5 after 'schools' : <u>, shops</u></p>

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		<p>trickle/slow or rapid charging. EV charging should be set up two way allowing for power stored in car batteries to be used in the property.</p> <p>There is a strong case for the wording to be changed to 'must' rather than 'should'.</p>	<p>the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p> <p>The checklists within the SPD require developers to provide a certain number of mitigation and adaptation measures, the approach enables the most appropriate and beneficial measures to be determined on a site by site basis. As such it is not considered appropriate to amend the wording to make the requirements mandatory.</p>	
V3. Principle 2				
J A Nixon	V.3	Solar panels should be encouraged.	Noted. Reference to encouraging the installation of solar panels is included within the SPD.	None.
The Inland Waterways Association (Warwickshire Branch)	V.3	Support.	Noted.	None.
Sarah Price	V.3	The current consultation on Part L does not follow the Energy Hierarchy as described in the SPD. The Fabric Energy Efficiency target has been removed and it is possible to build a new home with an ASHP and worse	The Energy Hierarchy is included within the SPD and it is clear that Reducing Energy Efficiency should come first as per the text on page 8.	None.

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		<p>insulation standards than the current building regulations. Stratford should recognise this and reinforce that the Energy Hierarchy is correct, energy efficiency comes first and foremost.</p> <p>This section is written with new buildings in mind, but more than 85% of the building stock will still exist in 2050. For 24 million homes, there will be a requirement to retrofit one home every 36 seconds for the next 30 years. In Stratford, there will be a rate of around 5 per year. Planning has a huge role to play in facilitating energy efficiency retrofit of homes which are in conservation areas. The SPD should make reference to existing buildings and how energy efficiency can be promoted in them.</p>	<p>Agree that a section on retrofitting would be useful.</p>	<p>Add new section V.2 (Retrofitting into existing buildings) into the SPD.</p>
Environment Agency - Sustainable Places	V.3	<p>This section should be expanded to include water efficiency measures reducing the demand on water resources. Water efficiency in new buildings is encouraged to reduce water use and cut domestic carbon emission and those from the treatment of water. Proposals that require efficient use of water will support Severn Trent's Water Resource Management Plan (2019).</p>	<p>Noted.</p>	<p>Page 8, V3, after 1st para add new para: <u>Water efficiency measures are encouraged in order to reduce the demand on water resources, reduce water use and cut down on domestic carbon emissions as well as those from the treatment of water. Proposals that encourage technologies for the efficient use of water will support Severn Trent's Water Resource Management Plan (2019).</u></p>
Councillor Nigel Rock	V.3	<p>The Merton Rule should be reinstated. This was where the council previously applied a 10% renewable rule. There is no barrier in doing so.</p>	<p>An SPD cannot set new policy, rather the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core</p>	<p>None.</p>

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			Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.	
Joanne Taylor	V.3	<p>Would like the document to be more ambitious with more compulsory items required.</p> <p>Would like SDC to achieve higher than Building Regulations goals on properties.</p> <p>Need to push for government legislation for new homes/buildings to be carbon neutral by a set date e.g.2025.</p>	<p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p> <p>Whilst the Council can't insist on higher standards than existing building regulations standards applicants are encouraged to meet higher standards and this is included within the checklists as a possible mitigation measure.</p>	None.
Anna Corser	V.3	Excellent section. Fully support these ideas. These should be <u>encouraged</u> in developments already agreed.	Support noted. However, the SPD can't be applied to proposals that already have planning permission.	None.
Facilities Integration Ltd	V.3	The expectations of Part L will move back into the planning phase or any project. This document should recognise more deeply than just a reference to the upgrade of parts F and L. The expectation will have an effect that expects a greater design level to be reached before a planning application/decision.	Noted. This is to be one of the main focus points of the forthcoming Core Strategy review. The results of the Government consultation have not been published to date and due to timescales of needing to progress the SPD it is not possible to wait for the outcomes of this	None.

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		With declaring a climate change emergency the expectation should be that the council starts to understand low to zero carbon and advises on this.	consultation. Any changes to Building Regulations would take effect outside of the scope of this SPD in any event.	
Bidford-on-Avon Parish Council - Clerk	V.3	The Parish Council fully supports this and would endorse any policies that require developers to ensure this. The proposed policies would be supported and the planning department should ensure all developers comply.	Support noted.	None.
Delta Planning	V.3	Agree with the approach outlined in the Energy Hierarchy detailed on page 8. Whilst the use of renewable sources can play an important role, it is agreed that well designed schemes and a fabric-first approach to design should be the starting point. The Energy Hierarchy supports this.	Support noted.	None.
Simon Forrester	V.3	This should apply to all buildings, new and old.	Noted. This document does relate to all types of development not just new build.	None.
IM Land	V.3	<p>IM fully supports the need for reducing energy demand and carbon emissions from new development. Whilst reference is made to the New Homes consultation it is not clear how these changes will impact on Building Regulations and building design.</p> <p>For example, some of the updates to Building Regulations is the update of carbon factors used in energy modelling. Carbon factors that are currently used are based on figures from 2012 and are out of date and new figures could potentially result in</p>	<p>Noted. This is to be one of the main focus points of the forthcoming Core Strategy review. The results of the Government consultation have not been published to date and due to timescales of needing to progress the SPD it is not possible to wait for the outcomes of this consultation.</p> <p>The SPD is as flexible as can be based on the current Core Strategy policies. It is important to note that the wording within the SPD has to be in accordance with the policies</p>	None.

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		<p>a switch from gas to electricity based heating systems.</p> <p>The use of updated carbon factors should then be followed through the remaining document to ensure that the consideration of low carbon renewable energy is compatible.</p> <p>The SPD should be flexible and recognise that major changes may be forthcoming.</p>	<p>of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	
St Modwen Developments	V.3	<p>St Modwen fully supports the need for reducing energy demand and carbon emissions from new development. Whilst reference is made to the New Homes consultation it is not clear how these changes will impact on Building Regulations and building design.</p> <p>For example, some of the updates to Building Regulations is the update of carbon factors used in energy modelling. Carbon factors that are currently used are based on figures from 2012 and are out of date and new figures could potentially result in a switch from gas to electricity based heating systems.</p> <p>The use of updated carbon factors should then be followed through the remaining document to ensure that the consideration of low carbon renewable energy is compatible.</p>	<p>Noted. This is to be one of the main focus points of the forthcoming Core Strategy review. The results of the Government consultation have not been published to date and due to timescales of needing to progress the SPD it is not possible to wait for the outcomes of this consultation.</p> <p>The SPD is as flexible as can be based on the current Core Strategy policies. It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	None.

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		The SPD should be flexible and recognise that major changes may be forthcoming.		
Public Health Warwickshire - Communities Group	V.3	Supports the principle around improving energy efficiency of buildings, however questions how this will be monitored.	Noted. The checklists will provide a means of being able to monitor how many energy efficiency measures are being implemented.	None.
Stratford Friends of the Earth	V.3	<p>Stratford Friends of the Earth considers that measures set out in a document prepared by Climate Action Leicester and Leicestershire should be considered by SDC for inclusion in the SPD. In summary it argues that further reduced carbon emissions of 19% emissions reduction over 2013, or 44% over 2006 Building Regulations. These higher standards can be achieved on site through a combination ensuring optimal passive orientation to maximise winter solar receipts, improved air tightness and more thermally efficient fabric. These are all Building Regulations parameters of energy efficiency and no further on building renewable or low carbon technologies are required to achieve the 19% reduction.</p> <p>A copy of the full report is available to view at:</p> <p>http://www.climateactionleicesterandleicestershire.org.uk/wp-content/uploads/2020/02/Evidence-that-LCC-could-adopt-19-plus-policy.pdf</p>	Noted. It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.	None.

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Shipston on Stour Town Council	V.3	<p>Will there be opportunities to support retro fitting to bring existing housing stock up to the same level as new build?</p> <p>Is there a conflict between density and the orientation of buildings to maximise sunlight?</p> <p>Is there a conflict between the encouragement of composting and the imminent charges for 'green' bins, the contents of which are used to produce compost? Is there a conflict between density and encouraging self-grown food in respect of garden sizes/orientation? Should passivhaus be a requirement for developers to consider? No reference to Hydrogen Power.</p>	<p>Agree that it would be beneficial to include information on retrofitting within the SPD.</p> <p>Each planning application is still determined on their individual merits and therefore density and encouraging self-grown food may not be appropriate for certain locations.</p> <p>Charging for the disposal of green bin waste could also encourage more people to home compost their green waste.</p> <p>It is currently not possible to insist on passivhaus standards as this goes beyond existing building regulations. However one of the roles of the SPD is to promote and encourage them.</p> <p>The SPD notes in Section 8 (Checklists) that the Council welcomes innovative and emerging technological solutions and just because something is not referenced in the SPD does not mean that it would not be appropriate.</p>	Add new section V.2 (Retrofitting into existing buildings) into the SPD.
A Jonathan Horsfield	V.3	Delete/third sentence. Insert 'Global energy demand is projected to rise over the coming years as a result of population growth and the desire for higher living standards – at the same time affordable finite resources	Agree to amend text.	Page 8, V3, third sentence, delete third sentence: There is also likely to be an increase in global demand for energy over the next few decades and this together with a depletion of North Sea oil and gas resource will mean that there will need to

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		<p>(including crude oil and natural gas) are depleting. Together this means there will need to be a very different set approaches to sourcing and using energy'. NB: It is expected that many developers and their design teams will have a learning curve in their designs, and in both the materials/technologies selected and their installation (builders experience)/ use in practice (customer experience).</p> <p>The lack of learning is a key factor in developer's reluctance to be more sustainable but is essential if there is a move towards a more sustainable future.</p> <p>The Energy Hierarchy – paragraph 1 – delete sentence 1. Replace with 'The building of more sustainable buildings will require the Energy Hierarchy to be taken into account from the outset of the design process – not as an afterthought. It should start with passive design then energy conservation/increased efficiency.</p> <p>Paragraph 2 – clarification over who has written the National Design Guide. A reference is required.</p>	<p>Agree. Reference will be made to the Design Guide source.</p>	<p>be a different approach to sourcing and using energy.</p> <p>Replace text with:</p> <p><u>Global energy demand is projected to rise over the coming years as a result of population growth and the desire for higher living standards. At the same time, affordable finite resources (including crude oil and natural gas) are depleting.</u></p> <p>Page 8, 'The Energy Hierarchy' Delete: If more sustainable buildings are to be built, it is important that energy conservation is considered using the energy hierarchy at the beginning of the design process.</p> <p>Replace text with: <u>The building of more sustainable buildings will require the Energy Hierarchy to be taken into account from the outset of the design process.</u></p> <p>2nd para, fifth sentence, add text after 'Oct 2019' to read:</p> <p><u>(Ministry of Housing, Communities & Local Government).</u></p>
V.3.1. Reducing the Need for Energy				
Sarah Price	V.3.1	It is fantastic to see Passivhaus mentioned in this document but it should be included in V3.1 so as not to confuse it with wider sustainability	Move Passivhaus box to V.3.1.	Move following text from page 15 to end of V.3.1, page 10.

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		<p>tools such as BREEAM. There should also be reference to performance gap as this is still a problem in the UK. In-use carbon is much more effective than in-design. Could planning recognise this and ask for a 'performance gap risk mitigation plan' for all new developments. It could also encourage the collection of in use data and testing of every home as opposed to a few.</p> <p>Natural ventilation is absolutely necessary for summer and purge ventilation, however in low energy homes that are increasingly airtight, natural ventilation is simply not appropriate and this should also be recognised even if it is intermittent or decentralised mechanical extract. It should not be ignored as it will lead to poor air quality especially in retrofitted buildings.</p>	<p>There is a chapter on ventilation further on in the SPD V.4.1.</p>	<p><u>Passivhaus is a standard for energy efficiency in a building and can be applied to both residential and non-residential development. The council welcomes Passivhaus schemes within the District and further information on the standard can be found at:</u></p> <p>http://passivhaustrust.org.uk</p> <p><u>Case Study</u> <u>An example of a Passivhaus scheme in the District is the Wooton Wawen Case Study in Section V7 (Case Study 6)</u></p>
Dr G J Nicholson	V.3.1	Support.	Noted.	None.
Climate Change Emergency Panel Group - Stratford-upon-Avon Town Council		<p>Whilst the planning document may be able to influence Developers with their design and build, the public should also be educated. For example, guidance will be required for many members of the public on how to undertake food planting and encourage them to use their compost for growing food as well as using their energy more efficiently. There is support for the idea of 'edible planting' which falls completely in line with work on developing Community</p>	<p>Comments noted, however the issues raised are outside the scope of the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	None.

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		orchards and a good mix of fruit trees in the District.		
Facilities Integration Ltd	V.3.1	<p>Would like to see passive solar as an expectation and not a wish. An onus should be place on the application to show what measures have been taken to ensure that any development best uses the natural resources such as the sun even to the detriment of making sites unviable.</p> <p>Wording should be 'are to be' rather than 'should be'.</p> <p>Page 9, paragraph 2. The comment on deciduous trees, this could be stronger by noting that favour would be shown for integrated housing schemes and landscape schemes even for small extensions. What happens to permitted consent developments?</p> <p>Page 9, paragraph 3. The expectation of building lifecycle assessment should be seriously considered. There are available methods. This is part of a BREEAM assessment and may be added using BRE Global software.</p> <p>Page 9, paragraph 4. Renewables are written about as if they are new-fangled. Many have been in operation for years. I support the suggestion although 'in a manner' needs explanation.</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>Agree that inclusion of information around permitted development would be beneficial to include within the SPD.</p> <p>The issue of building lifecycle assessment and embedded carbon will be considered as part of the Core Strategy review which is due to commence later in 2020.</p> <p>Information on permitted development is proposed within a new Section V.2 of the SPD.</p>	<p>None.</p> <p>Add new section V.2 – Retrofitting into existing buildings – into the SPD including information on permitted development.</p> <p>None.</p> <p>Add new section V.2 – Retrofitting into existing buildings – into the SPD including information on permitted development.</p>

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		<p>Page 9, paragraph 5. Of course allotments should not be sited on areas prone to waterlogging etc. But must they? The expectation is weak in its delivery.</p> <p>Page 10. Head of page. "developers are encouraged" ..followed by "consideration to..." Nice words but not forceful enough.</p>	<p>Noted, it is considered that the wording is appropriate.</p> <p>The purpose of the checklists is to provide flexibility in delivery of measures so that the best measures can be incorporated depending upon the circumstances of a specific development site.</p>	<p>None.</p> <p>None.</p>
A Jonathan Horsfield	V.3.1	<p>Paragraph 1 – Needs to include and justify 'why not'.</p> <p>Paragraph 3 – Reword 'water for comfort' to make it clearer what is meant.</p> <p>Paragraph 5 – Add in 'strongly' between 'will be' and 'supported'.</p> <p>Paragraph 8 – Add in 'and nut' between 'fruiting' and 'trees', 'cob and walnuts' between 'plum' and 'etc'.</p> <p>Should also include reference to perennial herbs. Suggest adding a link to the Incredible Edible web site which may be useful.</p> <p>Paragraph 9 – Add second to last sentence 'strongly' before 'encouraged'</p>	<p>The checklists address this.</p> <p>The sentences following this wording explains what is meant.</p> <p>Agree.</p> <p>Agree.</p> <p>Agree.</p> <p>Agree.</p>	<p>Pg 9, para 5, 3rd sentence add: '<u>strongly</u>' after 'be'.</p> <p>Pg 9, para 8, 1st sentence, add '<u>and nut</u>' between 'fruiting' and 'trees'.</p> <p>Pg 9, para 8, 2nd sentence, add '<u>and perennial herbs</u>' after 'herbs'.</p> <p>Pg 10, 1st para, 1st sentence, Add '<u>strongly</u>'.</p>
Delta Planning	V.3.1	The SPD suggests that allotments should be provided on new developments but this goes beyond the advice contained within Part L of	Noted. The wording in the SPD expands on that within Part L of the SPD. Given the Council declared a climate change	Page 9, para 7, add ' <u>where possible</u> ' after 'food production'.

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		<p>the Development Requirements SPD. Where reference to mains water supply, a shed and connected water butt this will only work on larger developments and not smaller developments. The provision of allotments as a type of open space within a development can cause visual and landscape impacts that are not necessarily associated with other forms of more natural forms of open space. Security concerns and hygiene issues should also be taken into account. It is important that the co-ordination of any allotment area within the wider development scheme is a priority.</p> <p>Composting facilities. There are strong concerns over communal home composting facilities and the respondent does not feel that this would work in practice. It would not be possible to monitor what is put into a communal compost area and this could lead to smells and vermin issues if not managed correctly.</p>	<p>emergency it is not unreasonable to request allotments as a use for outdoor space on developments.</p> <p>Each application will still be determined on its individual merits and this will include facilities on allotments.</p> <p>The management of such facilities would be the responsibility of the management company and not the district council.</p>	<p>No further action.</p> <p>No further action.</p>
IM Land	V.3.1	The UKCP18 climate projections note the potential for increasing annual temperatures and therefore design needs to balance solar gain with the potential for overheating. It is recommended these requirements are removed or re-drafted to include reference to overheating.	Reference is made to good design and minimising over-heating in the first paragraph including a number of points for consideration.	None.
Warwickshire County	V.3.1	This section could have more cross referencing to other topics such as flood risk, for example self closing	Noted and agree. Wording to be added for both flooding and allotments.	Page 10, add new paragraph/text to chapter V.3.2 regarding flooding:

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Council - Flood Risk		<p>airbricks can help make properties more resilient to flooding but often have to be retrofitted. If they were installed as the norm this would help to mitigate future impact of surface water flooding as a result of climate change. Allotments are often hard to site in areas that do not experience waterlogging due to predominantly clay ground conditions. As such, if allotments require land drainage, they should ensure they have a suitable outfall and do not increase flood risk to surrounding land. Rainwater reuse should be encouraged on an allotment wide basis in addition to water butts, such as rainwater harvesting systems as these reduce the reliance on mains water.</p>		<p><u>In order to help make properties more resilient to flooding in future, the installation of self-closing airbricks is encouraged for all new developments. This will help to mitigate future impact of surface water flooding as a result of climate change. For further mitigation measures in relation to flood risk see V5. Principle 4: Mitigating Flood Risk.</u></p> <p>Page 9, add text to paragraph 7, after 'developments'.</p> <p><u>If allotments require land drainage, they should ensure that they have a suitable outfall and do not increase flood risk to surrounding land. Rainwater reuse will be encouraged on allotments in addition to water butts, such as rainwater harvesting systems as these reduce the reliance on mains water.</u></p>
John Stott	V.3.1	<p>1st paragraph, 1st sentence. Delete 'ensure' and replace with 'demonstrate'. Delete 'well'.</p> <p>2nd sentence. Add 'energy use' after minimise.</p> <p>3rd sentence. Replace 'considered' with 'optimised'.</p> <p>Second bullet point. Add 'air tightness' after insulation.</p>	<p>Noted. They will need to demonstrate these measures through the checklist. Do not feel the wording needs to be changed. The wording still needs to comply with the Core Strategy.</p> <p>Not agreed.</p> <p>Not agreed.</p> <p>Agree.</p>	<p>Pg 9, 1st para, add '<u>air tightness</u>' after 'insulation'.</p> <p>Pg 9, 1st para, bullet point 3, add '<u>to minimise in summer and maximise in winter</u>' after 'gain'.</p>

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		<p>Third bullet point. Add 'To minimise in summer and maximise in winter' after 'gain'.</p> <p>Fourth bullet point. Add 'Which can be easily closed to maximise air tightness' after 'ventilation'.</p> <p>2nd paragraph. Delete 'considered' and replace with 'optimised'.</p> <p>Last sentence. Delete 'considered' and replace with 'included' after 'be'.</p> <p>6th Paragraph. Add 'are to be encouraged and' after 'thresholds'.</p>	<p>Agree.</p> <p>Agree.</p> <p>The wording still needs to comply with the Core Strategy.</p> <p>Not agreed.</p> <p>Agree.</p>	<p>Pg 9, 1st para, fourth bullet point, add <u>which can be easily closed to maximise air tightness</u> after 'ventilation'.</p> <p>Pg 9, 6th para, add text <u>'are to be encouraged and'</u> after 'thresholds'.</p>
V.3.2. Using Energy More Efficiently				
Facilities Integration Ltd	V.3.2	Welcoming approaches and insisting on approaches suggests a nice to have cake with no teeth to eat it. How is this going to be insisted on moving forward? Without the equivalent of Section 106 expectations there will be no action. This piece of work would appear to be uncoordinated.	Checklists have been produced and are attached to the back of the document. These introduce a minimum number of measures that will be required when submitting a planning application which includes a section on Renewable Energy measures. The SPD can only provide further detailed information on existing Core Strategy policies and not create new policy. However, there will be an opportunity to review the existing policies in the Core Strategy as part of the review due to start later this year.	None
Bloor Homes Western	V.3.2	It is understood that changes to part L are likely to be made in order to improve the energy efficiency of new buildings. Full details of this are not yet known, however it is likely to	The outcomes of the government consultation is not yet known and as such it is not possible for the SPD to go beyond existing building control regulations.	

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		<p>involve a further reduction of carbon emissions from Part L 2013 targets either 20% assessed using the metric of Dwelling Emission Rate and Fabric Energy Efficiency or a further improvement achieved using low and zero carbon technologies for heating and local energy generation.</p> <p>In both cases it is proposed that primary energy, a measure of fuel's environmental impact, will be used as the primary performance metric, with CO2 emissions forming the secondary.</p> <p>In addition, it is proposed that there is a monitoring and consultation period which will inform the Future Homes Standard, envisaged to take effect in 2025. There are no detailed proposals as yet, however the following is expected:</p> <ul style="list-style-type: none"> • Emissions of 75-80% less than Part L 2013 • Very high fabric standards • Low carbon heating system, using electric heat pumps, heat networks or direct electric resistance heating in some cases. <p>Photovoltaics. It is not only in conservation areas and Listed Buildings where the photovoltaics are sensitive. This applies equally where the use of photovoltaics causes a new development to be sensitive in visual</p>	<p>It is expected that the outcomes of the consultation will be addressed as part of the Core Strategy review which is due to commence in 2020.</p> <p>Agree that it would be helpful to amend the text to acknowledge this.</p>	<p>Page 10, para 3, add '<u>all</u>' before 'developments'.</p> <p>Page 10, para 3, add "<u>, particularly those</u>" after 'developments'.</p>

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		terms when otherwise it would not be so. This will also in some circumstances mitigate their use in situations in addition to Conservation Areas and Listed Buildings.		
Sarah Price	V.3.2	Energy efficiency is not just about insulation, but about a thermal bridge free design and air tightness. These should be included in this clause.	Noted. Reference to be made to thermal bridge free design and ensuring that buildings are built air tight.	Page 10, v.3.2, 2 nd sentence, add text after 'provided': <u>Including thermal bridge free design and ensuring buildings are air tight.</u>
John Stott	V.3.2	<p>"Dwellings and other buildings should ensure that the highest level of insulation as possible is provided and that lighting is the most energy efficient – for example, by using LED lightbulbs".</p> <p>Terms like 'highest level possible' and 'the most' are meaningless. There needs to be a minimum specified with strong aspirations that this is significantly exceeded.</p> <p>At "where dwellings include integrated appliances these should be the most energy efficient" add the following sentence: "Attention to airtightness is equally important and natural ventilation should not compromise airtightness"</p> <p>Building Regulations currently set out minimum standards for energy efficiency in new developments, however it is possible <u>desirable</u> to incorporate energy efficiency measures that go <u>well</u> beyond these minimum standards and the Council</p>	<p>Currently the wording will need to comply with the Core Strategy wording and therefore it is not possible to provide specific expectations. However this is something that will be considered as part of the Core Strategy review.</p> <p>Agree that proposed text amendments would be appropriate.</p>	<p>None</p> <p>Pg 10, v.3.2, 3rd sentence add text after 'lightbulbs'. <u>Air Tightness is equally important and natural ventilation should not compromise air tightness</u>. Delete possible and add '<u>desirable</u>'.</p> <p>Page 10, v.3.2, para 2, 2nd sentence, add '<u>well</u>' after 'go'.</p>

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		would welcome such approaches <u>e.g. Passivhaus</u>		
Anna Brindle	V.3.2	The document promotes the use of LED lights and efficient appliances within developments. The use of low energy lighting is included on the checklists and can be used to meet one criteria within Principle 2. However, although the document would encourage the use of the most efficient appliances, this would not serve to meet a required criterion within the checklist. As a result, developers are likely to be reluctant to install the highest energy efficient appliances, where there could be high cost implications on large scale development sites.	Agree to add some text in the SPD to suggest that integrated appliances should have a minimum of A+ rating.	Page 10, v.3.2, 2 nd sentence, add text after 'efficient' in first paragraph: <u>"with a minimum of A+ rating."</u>
IM Land	V.3.2	There is no guidance provided in the Consultation Document as to what 'solar' lighting is in the context of this measure. Additional information is therefore required.	On page 10 reference is made to LED lightbulbs. This is the type of lighting that should be considered.	Page 34, checklist, v.3.2, Add text for clarification purposes to checklist: Add: <u>"(e.g. LED lightbulbs)"</u>
St Modwen Developments	V.3.2	There is no guidance provided in the Consultation Document as to what 'solar' lighting is in the context of this measure. Additional information is therefore required.	On page 10 reference is made to LED lightbulbs. This is the type of lighting that should be considered.	Page 34, checklist, v.3.2, add text for clarification purposes to checklist: Add: <u>"e.g. LED lightbulbs."</u>
A Jonathan Horsfield	V.3.2	Add after 'energy efficient' 'at least A** rating'	Agree to add some guidance, however perhaps A+.	Pg 10, v.3.2, 2 nd sentence, add text after 'efficient' in first paragraph: Add text to end of sentence: <u>"at least A+ rating."</u>
The Inland Waterways	V.3.2	Supports this section.	Noted.	None.

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Association (Warwickshire Branch)				
V.3.3. Using Renewable Energy Environment Agency - Sustainable Places	V.3.3	<p>Groundwater Source Heat Pumps can be used for heating or cooling, however unless they are managed carefully there is the potential that the ground and groundwater can eventually warm or cool to a point where the system cannot continue to operate efficiently or at all. It is important that Developers are aware that they would need to undertake appropriate prior investigations if looking to use systems such as Ground Source Heat Pumps. This should include an environmental risk assessment and method statements for the construction and operation of the systems. These may be provided as part of the planning process. Ground Source Heat Pumps may also require an abstraction licence, discharge permit and flood risk permit from the EA and there is no guarantee that these will be granted.</p> <p>Water Source Heat Pumps. It is strongly advised that developers contact the EA in the first instance if looking to install these. They may require an abstraction licence, discharge permit and flood risk permit and there is no guarantee that these will be granted.</p>	<p>Noted. Add some text to make it clear that the EA should always be consulted on before installing any of the renewable technologies due to permits being required in some instances.</p>	<p>Page 10, v.3.3, 1st para, add text after 'proposal'.</p> <p><u>"The Environment Agency should be consulted on all proposals beforehand as permits may be required for which consent is not automatically given."</u></p>

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		<p>Hydropower Support is given to the development of sustainable hydropower schemes, however they can be complex and need to be designed and managed carefully in order to avoid unacceptable impacts on fish, the water environment and communities. Hydropower schemes require a number of permits and consents from the EA, again with no assurance that they will be granted.</p> <p>If water is required, then depending on the source of water and volumes required, an abstraction licence may be required. A licence must be in place before abstraction takes place and this can take up to 4 months from receipt of a valid application for a licence to be issued. There is no guarantee that a licence will be granted as it is dependent on water resource availability. All information on how to apply for licences is available on the Environment Agency website.</p>		
Councillor Nigel Rock	V.3.3	<p>Micro Wind Turbines. This section should be deleted. Research has shown that they are ineffective unless mounted on high rise sites but then this brings about issues around high frequency noise, reliability and safety.</p> <p>Small 'Farm scale' wind turbines may be appropriate in rare cases. They should demonstrate the environmental benefit (return in</p>	<p>Each application is determined on its own individual merits and micro wind turbines could still be an option for some developments.</p> <p>These are just one example of a renewable source that may be appropriate.</p>	None.

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		<p>energy) versus the environmental loss (visual harm). Justification would be off grid systems or where there is local use of energy or possible community led schemes.</p> <p>Heat pumps. It is difficult to see what direct effect the comments in the SPD will have on the planning outcome. All heat pumps attract an energy overhead in running the pump and efficiency and effectiveness are both dependent on individual cases. It is suggested grouping the comments to apply to all heat pumps. Qualified Advice should be sought before selecting the most appropriate technology.</p> <p>Need to consider the priority given to renewable energy in historic buildings.</p> <p>The respondent refers to a study by Halcrow which was presented to the Environment Quality and Climate Change Panel in July 2009. It made a number of assumptions about the usefulness of resources across the region. Further detail can be found in the report on each of the different renewable energy resources.</p> <p>The policy should encourage and positively assist the development of the items towards the top of the listing as set out in the Halcrow Study. The objective being to have systems that work effectively and for</p>	<p>It is important to maintain a degree of flexibility in relation to different renewable technologies available.</p> <p>This report was published in 2009 and text in the SPD has been taken from more up to date sources.</p> <p>The energy hierarchy provides a hierarchical approach.</p>	

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		<p>low priority resources, there should be a more rigorous assessment of the total energy balance and a strong weighting to produce evidence that the environmental gain overcomes any planning harm.</p> <p>Community schemes should be encouraged. In other countries, such schemes offer up a “bottom up” approach have been successful because the local communities are seen to have received gains or advantages. This is to be encouraged rather than a top down control and command approach, where local communities may perceive a scheme has been forced upon them and see it as inappropriate to the locale and the energy distribution requirements of the District. Generally, generation of energy that is used on site, or nearby, will always be desirable, avoiding the potential need for creating new grid infrastructure and losses in transmission.</p> <p>Finally, the LDF should also addresses the circumstance where a neighbouring development proposal comprises energy generation. For example, light to solar panels being blocked by a neighbouring development. This would also apply to other technologies such as wind and hydro.</p>	<p>These issues would be dealt with on a case by case basis when planning applications are submitted.</p>	

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Facilities Integration Ltd	V.3.3	<p>Page 10, paragraph 4. Ground mounting of PV uses up plantable resource. It also, without a clear sunpath, is potentially highly inefficient. This should not be included as a recommendation. There is no mention of battery supported solar power.</p> <p>This whole section requires a rethink. The direction should be towards design that supports LZC principles that will not fail the growing requirements of Part F and L of the Building Regs and exceeds these expectations.</p> <p>It is sensible to list the current available renewables but should not go into the detail and should point out that there are on-going developments in the field that will be favoured. The expectation of an extension to the Design Statement for based on energy use at planning stage level should be considered; or better the division of the Design and Access Statement into two documents: A Design for Climate Change and Sustainability Statement and an Access Statement.</p> <p>Biomass heating. Agree with the sentiment, however there should be an indication as to why a case by case review is required. It is not enough to</p>	<p>This could still be appropriate in certain instances and therefore the text should remain.</p> <p>The results of the Building Regulations consultation have not yet been published and there is little indication as to when these are due out. Therefore, due to the timing and need to adopt the SPD this is something that will need to be considered as part of the Core Strategy review.</p> <p>Text to be added to take into account new and emerging technologies.</p> <p>Biomass may be appropriate in specific areas or for specific proposals and therefore it is</p>	<p>None.</p> <p>None.</p> <p>Page 5, after 1st para add new para: Add text: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not restricted to only those technologies within it."</u></p> <p>None.</p>

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		make this note and then have a paragraph below on how good it is. Suggest removing the wording relating to cost.	intended to keep this in as an option.	
Stratford Climate Action	V.3.3	Section v.3.3 claims that 'In Order for PV panels to be effective they should be installed on roofs that are as close to south-facing as possible'. In fact PVs can be effective with an East/West split, and even on low-pitched roofs facing North.	Noted and agree. Will amend text.	<p>Page 10, photovoltaics, fourth para, Delete:</p> <p>In order for PV panels to be effective they should be installed on roofs that are as close to south-facing as possible and not obstructed by buildings and trees.</p> <p>Replace with text:</p> <p><u>"The best position for solar panels would be on a south facing roof, due to the intensity of the sun for longer periods of time. However, they are still effective on east and west facing roofs too."</u></p>
The Inland Waterways Association (Warwickshire Branch)	V.3.3	Support.	Noted.	None.
Sarah Price	V.3.3	Micro Wind is not an efficient technology. This was proven in the Warwick Wind Trials (by a local company!) in 2006-07 and lead to the demise of the micro wind turbine industry. Wind turbines do not function well around trees, buildings or any kind of obstacle to natural air flow. This technology is only suitable in large open areas. Here is a link to the report which shoes that the average wind turbine produce 78 kWh per year, which is about £ 10 per year savings. http://www.wind-power-	Noted. Whilst Micro wind turbines may not be suitable in all locations or for all developments, they may still be an option for some. Therefore, in order to allow flexibility it is intended to keep this section in the SPD.	None.

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		<p>programe.com/Library/Warwick+Wind+Trials+Final+Report+(1).pdf</p>		
Sarah Price	V.3.3	<p>Thermal stores are quite an old technology and shouldn't be used in low energy buildings as they are significant contribution to overheating, even when well insulated.</p>	<p>The technologies within the SPD are examples of different types of renewable energy available and each application is determined on its individual merits. It is the responsibility of the applicant to ensure that the technologies are suited to individual applications.</p>	None.
John Veasey	V.3.3	<p>The government need to re-introduce attractive grants for such schemes and not do what they did to solar panels. Solar panels should also be considered with battery storage systems.</p>	<p>Comments noted, however the issues raised are outside the scope of the SPD.</p> <p>The Council, as part of its commitment to tackling climate change, is considering a wide range of issues including the funding of adaptation and mitigation measures. The comments made by the respondent will be passed on to the Council's Climate Change Panel.</p>	None.
John Hale	V.3.3	<p>If the project involves energy generation facilities they must be directly and specifically renewable and sustainable, not fossil fuel unless they are zero carbon by virtue of carbon capture and storage and include combined heat and power. Otherwise, grid power is cleaner and preferable as above.</p>	<p>The SPD encourages renewable and sustainable technologies as the most appropriate and the energy hierarchy supports this. Fossil Fuels should only be considered as a last option and if they are used more cleanly and efficiently.</p>	None.
Dr R J Tucker	V.3.3	<p>There is potential for a micro hydro scheme close to Lucy's Mill in Stratford and possibly other weirs along the Avon. Each could generate a reliable power source for up to 12 dwellings (my estimate). Micro hydro</p>	<p>Noted. This would be up to individual communities to decide.</p>	None.

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		<p>has already been installed along the Avon. However there is not little commercial incentive currently with the cessation of the FIT (feed-in-tariff). It could be viable however as a community funded project where participants share costs and benefits. This also applies to other RE projects.</p>		
John Stott	V.3.3	<p>There are a range of options available to incorporate renewable energy into new developments, and the best solution will depend upon the individual circumstances of a particular proposal.</p> <p>The main options are set out below- Photovoltaics Cells do not (remove necessarily) need direct sunlight to work as they can still generate electricity on a cloudy day but it is important to avoid shading. Small amounts of shading can cause disproportionate performance penalties. Software exists to assess effects of shading and should be utilised in cases of doubt.</p> <p>Solar Water Heating These systems or 'solar thermal' systems use free heat from the sun to warm up domestic hot water. If solar energy is unavailable or there is a desire to have hotter water, heating should be provided but note that gas boilers are now non preferred and these will be inadmissible after 2025.</p>	<p>Agreed.</p> <p>Amend text as suggested</p>	<p>None.</p> <p>Amend the first paragraph on photovoltaics to read:</p> <p><u>"Solar Panel systems also known as PV, capture the sun's energy using photovoltaic cells. The cells do not necessarily need direct sunlight to work as they can still generate some electricity on cloudy days but it is important to avoid shading. Small amounts of shading can cause disproportionate performance penalties and software exists to assess effects of shading and should be utilised in cases of doubt."</u></p> <p><u>These systems or 'solar thermal' systems use free heat from the sun to warm up domestic hot water. If solar energy is unavailable or there is a desire to have hotter water, a back-up conventional boiler or immersion heater heating should be provided but note that gas boilers are now</u></p>

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		<p>Once the initial installation has taken place, the hot water costs will be reduced and solar hot water is a green, renewable heating system which can reduce carbon dioxide emissions. Solar collectors are usually installed on roofs, but can also be ground-mounted.</p> <p>Micro Wind Turbines- These are only efficient if installed in undisturbed air flow i.e. well clear of roofs and trees, if attached to buildings, design should limit mechanically transmitted noise within the building.</p> <p>Air Source Heat Pumps- Change to state - these absorb heat from the outside air which can then be used to provide hot water and to heat, the building, preferably by under floor systems which provide greater efficiency than radiators.</p>		<p>non preferred and these will be inadmissible after 2025. Can be used.</p> <p>This system works all year around although in winter months, the water may need to be heated further with a back-up boiler or immersion heater. Once the initial installation has taken place, the hot water costs should be reduced and solar hot water is a green, renewable heating system which can reduce carbon dioxide emissions. Solar collectors are usually installed on roofs, but can also be ground-mounted.</p> <p>Add new paragraph 3 to section on micro wind turbines to read:</p> <p><u>"Micro wind turbines are often only efficient if installed in undisturbed air flow i.e. well clear of roofs and trees. If attached to buildings, the design should limit mechanically transmitted noise within the building."</u></p> <p>Amend the first paragraph on Air Source Heat Pumps to read:</p> <p><u>"These absorb heat from the outside air which can then be used to provide hot water and to heat the building, preferably by under floor systems which provide greater efficiency than radiators. heat radiators, under floor systems or warm air convertors and hot water in the home."</u></p> <p>Amend the first sentence of Ground Floor Heat Pumps to read:</p>

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		<p>Ground Source Heat Pumps Note that as with air source heat pumps, maximum efficiency is normally obtained with underfloor heating.</p> <p>Water source Heat Pumps Some suggesting word changes suggested- (radiators but preferably underfloor heating for maximum efficiency)</p> <p>Micro hydro Suggests here the word heat be changed to power.</p>		<p>"Ground source heat pumps are used to heat underfloor or warm air heating systems, hot water and radiators, <u>maximum efficiency is normally obtained with underfloor heating.</u>"</p> <p>Amend the third paragraph of Water Source Heat Pumps to read:</p> <p>"The fluid is then compressed by an electric compressor which raises the temperature. A heat exchanger can be used to remove the heat from the working fluid, providing hot water that can be used for space heating (radiators <u>but preferably</u> or under floor heating <u>for maximum efficiency</u>). "</p> <p>Amend the third paragraph of Micr Hydro to read:</p> <p>"These systems can generate for 24 hours a day, generating all the electricity that you need and more. Excess heat <u>power</u> that is generated can be used to heat up the home and hot water too."</p>
IM properties	V.3.3	<p>Agrees there is a need for a different approach to sourcing and using energy, to reduce carbon dioxide and other greenhouse gasses, which can be achieved through the application of the energy hierarchy. Appendix 1 of the draft SPD sets out that renewable energy sources must be provided for all new build development unless it can be suitably justified and evidenced that it is not</p>	<p>Noted. Agree that this goes over and above the policies in the Core Strategy and therefore, the checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p>

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		<p>possible to be provided as part of the development proposal.</p> <p>This guidance is contrary to local planning policy for climate change and sustainable construction. Policy CS.2 of the Core Strategy states ‘the Council will promote an ‘energy hierarchy’ in seeking to achieve carbon dioxide emissions reduction as follows”:</p> <ul style="list-style-type: none"> (i) reduce energy demand through energy efficiency measures; (ii) supply energy efficiently and give priority to decentralised energy supply; and (iii) Provide energy from renewable or low carbon energy sources. <p>The mandatory requirement in Appendix 1 elevates the requirement for the provision of renewable energy sources above that currently set out in adopted local planning policy and section V3 of the draft SPD. The elevation has not been robustly justified in the draft SPD, particularly when energy conservation can be considered at the beginning of the design process by reducing the need for energy and using energy more efficiently.</p>		
IM Land	V.3.3	<p>IM supports the use of renewable energy systems where they are suitable providing long term benefit which is not just to meet a planning policy requirement. With the decarbonisation of the electricity network and anticipated switch to</p>	<p>All of the technologies included in the SPD are options and if there are alternative technologies which are more appropriate these will also be supported/encouraged. Text is to be added to reflect this.</p>	<p>Add a new sentence at the end of the second paragraph to Section V.3 to read:</p> <p><u>“There are likely to be other new and emerging technologies in the future and therefore development proposals are not</u></p>

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		<p>electricity based heating systems, greater consideration should be placed on electricity based low carbon renewable energy systems. Care needs to be taken to ensure systems are not promoted that could lead to an increase in carbon emissions.</p> <p>Micro wind turbines - technology has long been discounted on a building level. Warwick Wind Trials from 2008 analysed the performance of small scale building mounted wind turbines and demonstrated the performance benefit of this type of technology is negligible recommended to remove this sections.</p> <p>Biomass heating- considered on a case by case basis, this approach is supported where it may be suitable, however it is unlikely this will be suitable in residential development due to issues with cost, air quality and storage requirements for fuel. This section should be removed given anticipated changes to building regulations and potential new low carbon electricity systems.</p> <p>Micro Hydro- Noted at page 14 as a potential renewable energy generation system. This is true but the installation of a system for a household development is extremely unlikely to given the potential cost of doing so. Gaining appropriate environmental licencing for this</p>	<p>Applications will still be determined on a case by case basis.</p> <p>All of the technologies included in the SPD are options and if there are alternative technologies which are more appropriate these will also be supported/encouraged. Text is to be added to reflect this. Applications will still be determined on a case by case basis. In relation to biomass heating the SPD already caveats that its use will only be appropriate in certain locations, this is considered appropriate.</p> <p>Agree that reference to licensing would be helpful. Whilst it may not be suitable for householder developments, micro hydro may still be suitable for larger residential and non-residential developments.</p>	<p><u>restricted to only those technologies listed within it."</u></p> <p><u>Add a new paragraph 3 to Micro Wind Turbines to read</u></p> <p><u>"Micro wind turbines are often only efficient if installed in undisturbed air flow i.e. well clear of roofs and trees. If attached to buildings, the design should limit mechanically transmitted noise within the building."</u></p> <p><u>Add new sentence at the end of the first paragraph in V.3.3 to read:</u> <u>"The Environment Agency should be consulted on all proposals beforehand as permits may be required for which consent is not automatically given."</u></p>

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		<p>installation of such a system usually makes this type of system unfeasible. Additional information on the requirements for delivery should be included.</p> <p>No specific guidance is included on how a development may comply with the renewable energy requirement set out in Appendix 1 of the SPD. Cs.2 Upon which this guidance document is draw, states development should be designed in accordance with the energy hierarchy through reducing carbon emissions through fabric and energy efficiency before renewables are used. Similarly the SPD advocates use of this hierarchy.</p> <p>Setting mandatory requirement for renewable energy in Appendix 1 elevates this provisions above currently set out and adopted local planning policy and section V3 of the SPD. Also this elevation has not been robustly justified in the SPD. Particularly when energy conservation can be thought about at the start of a design process by reducing the need for energy and using energy more efficiently.</p> <p>The SPD should make clear the information or criteria required to justify and/or evidence why renewable energy sources cannot be provided at a building and/or site wide scale.</p>	<p>Noted. The checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p>

Respondent Reference	Document Ref. / Section	Summary of Comments	Officer Response	Proposed amendments to Part V (Climate Change Adaptation and Mitigation) of Development Requirements SPD
		<p>Should consider Building regulations changes that are anticipated in 2020 are likely to lead to enhanced carbon reduction requirements from new development and from 2025 a switch away from fossil fuel heating systems.</p> <p>It is felt insufficient evidence has been provided on how the requirement for renewable energy in new development has been arrived at, how this is to be implemented, how it might align with anticipated changes to Building Regulations. Recommend to update this guidance once Government has released the detail of the Future Homes standard.</p>	<p>The results of the government's Building Regulations consultation have not yet been published and there is little indication as to when these are due out. Therefore, due to the timing and need to adopt the SPD the wider This will be reviewed as part of the Core Strategy review.</p>	
IM Land	V.3.3	<p>Composting and community composting: There is no information provided on this measure within the Consultation Document, additional guidance is required on what this measure may require.</p>	<p>Noted. Add text to paragraph.</p>	<p>Page 10, 2nd sentence, add text after 'gardens' :</p> <p><u>" , for example a compost bin to be provided for each new dwelling."</u></p> <p>Page 10, third sentence, add text after 'developments':</p> <p><u>"Communal home composting areas should be situated in areas which are easily accessible and would not have an adverse impact on the local community."</u></p>
Warwickshire County Council - Flood Risk	V.3.3	<p>Any proposed Micro-hydro plants would need to consider flood risk and how they are constructed to ensure no detriment to watercourses or main rivers. An Environmental Permit from the EA on a Main river or an Ordinary Watercourse Land Drainage Consent</p>	<p>Text to be added with regards to permits from the EA.</p>	<p>Page 10, v.3.3, 1st para, add text after 'proposal'.</p> <p>Add text after 'proposal'.</p> <p><u>"The Environment Agency should be consulted on all proposals beforehand as</u></p>

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		from WCC on an Ordinary Watercourse will be required separately from the planning process.		<u>permits may be required for which consent is not automatically given.</u>
Simon Forrester	V.3.3	Relating to the point above (the point is regarding all buildings to require improvement of energy efficiency) Relating to the point above about the priority, all buildings, including listed building, should automatically have permission for PV panels. The only query should be around the type of PV panel best suited to be sympathetic to the listed building.	There is legislation surrounding listed buildings. Each planning application will be determined on its individual merits and this will include PV panels and listed buildings. A new section V2 is to be included in the SPD to consider retrofitting and permitted development. What is and isn't permitted development is set out within national legislation and it is not possible for this SPD to change this.	Add a new section V2 (Retrofitting into existing buildings) to include information on permitted development.
Miranda Forrester	V.3.3	If SDC is serious about making a difference, it is essential that all new housing has PV panels. And in relations to Listed Buildings priority must be given to allowing PV panels on south or west facing roofs. It is not feasible to have them ground mounted where they will take up space in a garden and would anyway look more unsightly than on a roof. There are now PV panels that look like slate, and other alternatives, this must now be allowed. It is not just PV panels for all buildings it's any source of alternative energy.	PV panels are encouraged as per wording in the SPD. Each individual planning application is determined on its individual merits and this will include listed buildings. A new section V2 is to be included in the SPD to consider retrofitting and permitted development. What is and isn't permitted development is set out within national legislation and it is not possible for this SPD to change this.	Add a new section V2 (Retrofitting into existing buildings) to include information on permitted development.
St Modwen Developments	V.3.3	The Respondent supports the use of renewable energy systems where they are suitable providing long term benefit which is not just to meet a planning policy requirement. With the decarbonisation of the electricity	All of the technologies included in the SPD are options and if there are alternative technologies which are more appropriate these will also be supported/encouraged. Text is to be added to reflect this.	Add a new sentence at the end of the second paragraph to Section V.3 to read: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not</u>

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		<p>network and anticipated switch to electricity based heating systems, greater consideration should be placed on electricity based low carbon renewable energy systems. Care needs to be taken to ensure systems are not promoted that could lead to an increase in carbon emissions.</p> <p>Micro wind turbines - technology has long been discounted on a building level. Warwick Wind Trials from 2008 analysed the performance of small scale building mounted wind turbines and demonstrated the performance benefit of this type of technology is negligible recommended to remove this sections.</p> <p>Biomass heating- considered on a case by case basis, this approach is supported where it may be suitable, however it is unlikely this will be suitable in residential development due to issues with cost, air quality and storage requirements for fuel. This section should be removed given anticipated changes to building regulations and potential new low carbon electricity systems.</p> <p>Micro Hydro- Noted at page 14 as a potential renewable energy generation system. This is true but the installation of a system for a household development is extremely unlikely to given the potential cost of doing so. Gaining appropriate</p>	<p>Applications will still be determined on a case by case basis.</p> <p>All of the technologies included in the SPD are options and if there are alternative technologies which are more appropriate these will also be supported/encouraged. Text is to be added to reflect this. Applications will still be determined on a case by case basis. In relation to biomass heating the SPD already caveats that its use will only be appropriate in certain locations, this is considered appropriate.</p> <p>Agree that reference to licensing would be helpful. Whilst it may not be suitable for householder developments, micro hydro may still be suitable for larger residential and non-residential developments.</p>	<p><u>restricted to only those technologies listed within it."</u></p> <p><u>Add a new paragraph 3 to Micro Wind Turbines to read</u></p> <p><u>"Micro wind turbines are often only efficient if installed in undisturbed air flow i.e. well clear of roofs and trees. If attached to buildings, the design should limit mechanically transmitted noise within the building."</u></p> <p><u>Add new sentence at the end of the first paragraph in V.3.3 to read:</u> <u>"The Environment Agency should be consulted on all proposals beforehand as permits may be required for which consent is not automatically given."</u></p>

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		<p>environmental licencing for this installation of such a system usually makes this type of system unfeasible. Additional information on the requirements for delivery should be included.</p> <p>No specific guidance in included on how a development may comply with the renewable energy requirement set out in Appendix 1 of the SPD. Cs.2 Upon which this guidance document is draw, states development should be designed in accordance with the energy hierarchy through reducing carbon emissions through fabric and energy efficiency before renewables are used. Similarly the SPD advocates use of this hierarchy.</p> <p>Setting mandatory requirement for renewable energy in Appendix 1 elevates this provisions above currently set out and adopted local planning policy and section V3 of the SPD. Also this elevation has not been robustly justified in the SPD. Particularly when energy conservation can be thought about at the start of a design process by reducing the need for energy and using energy more efficiently.</p> <p>The SPD should make clear the information or criteria required to justify and/or evidence why renewable energy sources cannot be</p>	<p>Noted. The checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p>

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		<p>provided at a building and/or site wide scale.</p> <p>Should consider Building regulations changes that are anticipated in 2020 are likely to lead to enhanced carbon reduction requirements from new development and from 2025 a switch away from fossil fuel heating systems.</p> <p>It is felt insufficient evidence has been provided on how the requirement for renewable energy in new development has been arrived at, how this is to be implemented, how it might align with anticipated changes to Building Regulations. Recommend to update this guidance once Government has released the detail of the Future Homes standard.</p>	<p>The results of the government's Building Regulations consultation have not yet been published and there is little indication as to when these are due out. Therefore, due to the timing and need to adopt the SPD the wider This will be reviewed as part of the Core Strategy review.</p>	
A Jonathan Horsfield	V.3.3	<p>Using Renewable Energy. It is suggested getting the wording reviewed in this section by a renewable industry expert. This will provide clarification. Currently, the text could be misleading. Agree with Cllr Rock's comments regarding the Merton rule. However 10% is not considered to be high enough and it should be changed to 20%.</p> <p>Designated spaces and related cabling for the future installation of electricity and heat generating plant must be included in the building projects where buildings do not have all of their requirements met from on-site generation at the outset.</p>	<p>Currently the wording within the SPD is intended to outline the various different renewable energy options available and to avoid the document becoming overly long and detailed it is deliberately succinct, as such it is not intended to provide a detailed analysis of each type of renewable energy rather just a summary. This is not to say that all types listed are suitable for every development and planning applications will still be determined on their own individual merits.</p> <p>The SPD is as flexible as can be based on the current Core Strategy</p>	None.

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		<p>Paragraph 5. Solar PV rewrite to say 'panels should ideally face due south, but can be installed facing from east to west without significant loss of generating capacity, and not 'overshadowed' by trees or buildings rather than 'obstructed'. Include a paragraph on ground mounted solar PV. Paragraphs on Solar Water Heating – rewrite paragraph. Graphic is not helpful and suggest adding a caption to say 'not to scale would help if a better graphic can't be found'.</p> <p>Micro Wind Turbine. Need to clarify what scale micro is. Should also include a paragraph on small-medium scale turbines which could help supply local businesses. This section will need to be re-written as out of date. Does not agree that this section should be deleted. If this technology didn't work well previously it does not mean that it will not work now. It is suggested seeking professional advice to ensure there is a clear message in this respect.</p> <p>Air Ground and Water Heat Pumps. Text should be reviewed.</p> <p>Biomass Heating. The tone of the wording is inappropriate and this important source of heating should not be disregarded especially as gas heating will be reduced. The graphic does not represent a typical domestic</p>	<p>policies. It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p>	

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		<p>system and is more akin to a very large house or business.</p> <p>Rewrite V3.3 Micro Hydro section.</p>		
St Modwen Developments	V.3.3	Composting and community composting: There is no information provided on this measure within the Consultation Document, additional guidance is required on what this measure may require.	Noted. Add text to paragraph.	<p>Page 10, 2nd sentence, add text after 'gardens' :</p> <p><u>" , for example a compost bin to be provided for each new dwelling."</u></p> <p><u>Page 10, third sentence, add text after 'developments':</u></p> <p><u>"Communal home composting areas should be situated in areas which are easily accessible and would not have an adverse impact on the local community."</u></p>
V.3.4 Using Clean and Efficient Fossil Fuels				
Facilities Integration Ltd	V.3.4	<p>Paragraph 1. The electric charging note appears to be in the wrong place and 'should' would be better as 'is to be'.</p> <p>"at least 10%" is not acceptable as guidance and should be shown as a minimum.</p> <p>Paragraph 14. Last paragraph. Unsure as to whether this can be supported, especially the comment regarding acceptable use of fossil fuels.</p> <p>P 15. BREEAM. BREEAM 'Good' standard is not really an acceptable level if you are a climate change advocate with a stated stance of declaring a climate change emergency. Excellent should be the</p>	<p>Noted and agreed. Paragraph is a duplication and is already under V.2.5.</p> <p>CHP is still an option in some circumstances when other more sustainable options are not possible, and therefore it should remain in the document.</p> <p>The wording of the SPD is not able to go above and beyond that of the Core Strategy and currently developments are required to achieve BREEAM 'Good' standard</p>	<p>Pg 14, v.3.4, para 1, Delete the following paragraph:</p> <p>At least one electric vehicle charging point per unit should be provided for residential developments and for commercial, retail and industrial on at least 10% of parking spaces. These may be phased with 5% of initial provision and the remainder being provided at an agreed trigger level.</p> <p>Further information on requirements for electric vehicle charging points can be found in Part R: Air Quality.</p>

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		<p>main aim with 'very good' as an absolute minimum with an award for outstanding.</p> <p>Supporting a BREEAM approach would be sensible as it is a third party assessed scheme with a post construction follow up that could be made to force remedials.</p> <p>Passivhaus is fine but not as flexible in its expectations in design terms in a less extreme climate. In addition, it is based on a mechanical ventilation scheme, whereas BREEAM does not have quite the same expectation and is more focussed on overall co-ordination.</p>	<p>with the Core Strategy. This is something that will be considered as part of the wider Core Strategy review.</p>	
Stratford Friends of the Earth	V.3.4	<p>There are no clean fossil fuels therefore paragraph 2 on combined heat & power should be deleted. The heading should be changed to Electric Charging points. Para 1 At least one electric vehicle charging point per unit should be provided for residential developments and for commercial retail and industrial on at least 10% of parking spaces. These may be phased with 5% of initial provision and the remainder being provided at an agreed trigger level. Response: By the time these houses are built there will be a need for all parking spaces to have electric chargers. So, the above paragraph should read '100% of parking space.'</p>	<p>CHP is still an option in some circumstances when other more sustainable options are not possible, and therefore it should remain in the document.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken - which is anticipated to commence later this year - existing policies can be reconsidered.</p>	<p>None.</p> <p>Pg 14, v.3.4, para 1, Delete the following paragraph:</p> <p>At least one electric vehicle charging point per unit should be provided for residential developments and for commercial, retail and industrial on at least 10% of parking spaces. These may be phased with 5% of initial provision and the remainder being provided at an agreed trigger level.</p>

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			The requirements for EV Charging Points is set out within V.2.5 and will be deleted from this section to avoid duplication.	Further information on requirements for electric vehicle charging points can be found in Part R: Air Quality.
John Hale	V.3.4	<p>In all cases of using fossil fuels in proposed development, particularly for generating power, all possible alternatives should be considered in preference.</p> <ul style="list-style-type: none"> • In line with Core Strategies it is pertinent to establish and validate local need. • Is there a renewable or sustainable alternative? , if yes then use it. <p>National grid is increasingly fed by a high and rapidly increasing proportion of renewable sources, so that should always be used in preference to any new fossil fuels generating source locally, which will undoubtedly be less efficient and higher carbon than the average National Grid sources power. NB: fossil fuel is no longer sustainable for 'peak load' generating as so many clean renewable alternatives exist.</p>	<p>This is where the Energy Hierarchy comes into play.</p> <p>There is reference to this in the SPD.</p>	None.
Dr G J Nicholson	V.3.4	Support	Noted	None.
St Modwen Developments	V.3.4	As noted above, it is anticipated that the Building Regulations will be updated in 2020 to include accurate carbon emissions factors. The decarbonisation of the grid and new carbon factors will eliminate the carbon benefit of gas fired combined heat and power (CHP) systems and it	Noted. Currently the update to Building Regulations has not been published and therefore this is something that will be taken into consideration in the Core Strategy Review. However, text will be added to incorporate new and emerging technologies.	Page 5, after 1 st para add new para: Text to be added: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not</u>

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		is recommended that the section on CHP at Page 14 is updates to reflect the decarbonisation of the electricity network and anticipated switch to all electric heating.		<u>restricted to only those technologies within it.</u>
IM Land	V.3.4	As noted above, it is anticipated that the Building Regulations will be updated in 2020 to include accurate carbon emissions factors. The decarbonisation of the grid and new carbon factors will eliminate the carbon benefit of gas fired combined heat and power (CHP) systems and it is recommended that the section on CHP at Page 14 is updated to reflect the decarbonisation of the electricity network and anticipated switch to all electric heating.	Noted. Currently the update to Building Regulations has not been published and therefore this is something that will be taken into consideration in the Core Strategy Review. However, text will be added to incorporate new and emerging technologies.	Page 5, after 1 st para add new para: Text to be added: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not restricted to only those technologies within it."</u>
St Joseph Homes Limited	V.3.4	In relation to V.3.4, it is important that policy guidance keeps up-to-date with ongoing strategic shifts in the national and international energy context. For example, there is a strong strategic direction away from gas at present, with new connections to the gas grid expected to be discouraged or prohibited by 2025. We suggest the wording of this section is expanded to reflect on the evolving energy context.	Noted and agreed that some text should be added to reflect new technologies emerging.	Page 5, after 1 st para add new para: Text to be added: <u>"There are likely to be other new and emerging technologies in the future and therefore development proposals are not restricted to only those technologies within it."</u>
John Stott	V.3.4	Electrical charging points – further information on requirements for electric vehicle charging points can be found in part R: Air Quality	Noted. This is cross-referenced within the SPD.	None.
A Jonathan Horsfield	V.3.4	Paragraph 1. This is in the wrong place. Should possibly move to page 7, electric charging.	Noted and agree. Delete paragraph. Noted. Will provide a space.	Pg 14, v.3.4, para 1, Delete the following paragraph: Delete the following paragraph:

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		<p>Combined Heat and Power. Would help if text on 'centralised' and 'domestic' were separated out.</p> <p>Battery storage has not been referenced and this is an important omission. This is crucial technology that will enable the better use of electricity generated locally and is very important in relation to the growth of the EV market. On site generation can be saved for charging vehicles and vehicles with a high charge level can be used to power domestic needs. This needs to be covered in relation to properties being made ready for future installations.</p>	<p>Noted. Will add a small paragraph on battery storage.</p>	<p>At least one electric vehicle charging point per unit should be provided for residential developments and for commercial, retail and industrial on at least 10% of parking spaces. These may be phased with 5% of initial provision and the remainder being provided at an agreed trigger level.</p> <p>Further information on requirements for electric vehicle charging points can be found in Part R: Air Quality.</p> <p>Page 14, Thermal Stores, add new para :</p> <p><u>"Battery storage allows for energy to be stored for use at a later time. For example, if solar panels are installed these can generate electricity during daylight. If a battery is in place, the energy can be used later when the sun is no longer shining."</u></p>
V4. Principle 3				
The Inland Waterways Association (Warwickshire Branch)	V.4	The respondent supports this section of the SPD	Noted.	None.
Environment Agency - Sustainable Places	V.4	The respondent supports this section of the SPD and welcome this principle. Recommend further emphasis on blue-green corridors as they provide	The SPD currently encourages green corridors and goes on to state that these can include both land and water corridors. However,	Add additional section to Section V.4.3 Green Infrastructure, beneath "Green Walls" paragraph:

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		<p>multiple benefits including cooling local temperatures. All developments should create space for water by restoring floodplains and contributing toward blue-green infrastructure.</p> <p>Please see rest of response for details.</p>	<p>it is agreed that blue-green corridors should be more specifically encouraged and wording should be included to note the benefits of blue/green corridors.</p> <p>It is not considered appropriate to require all developments to create space for water as developments will differ in nature and it may not be possible or reasonable to expect all developments to do this.</p> <p>The restoration of floodplains is a strategic policy matter dealt within in the adopted Core Strategy Policy CS.4, which states that "The flood plain will be maintained and, where opportunities arise, restored". As such, it is not policy that can be addressed within this SPD as it is beyond the scope of the SPD to create new policy. However, this policy is something that can be reviewed in the Core Strategy Review which is expected to commence later this year.</p>	<p><u>"Green/Blue Corridors</u> <u>Green/blue corridors are strips of green and/or blue (watercourse) infrastructure which link green/blue spaces in developments to the surrounding biodiversity network. They can have multiple benefits, including the cooling of local temperatures, the provision of flood management and the enhancement of biodiversity."</u></p> <p>Amend title of Section to "V.6.3 Local Wildlife Nodes and <u>Blue/Green Corridors</u>"</p> <p><u>Green/blue corridors are strips of green and/or blue infrastructure which link green/blue spaces in developments to the surrounding biodiversity network, enabling the bridging of habitats where they have been separated by human development. The provision of these will be encouraged in all major developments, and also in minor developments where appropriate. They can be either land or water corridors, and can be designed to incorporate walking and cycling routes, thereby reducing reliance on the car by promoting active travel, as well as enhancing biodiversity and encouraging wildlife in the area. <u>Blue/green infrastructure can have multiple benefits, including flood management provision, the encouragement of biodiversity and the lowering of local temperatures"</u></u></p>

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Anne Corser	V.4	States this section is well thought out. Having green spaces as suggested will make a very positive impact. However sensitive and regular maintaining of these areas must also be built in defining responsibility for this in the future.	It is considered that this section already appropriately notes and emphasises the need for sufficient and ongoing maintenance of green infrastructure.	None.
Bidford-on-Avon Parish Council - Clerk	V.4	The Parish Council would support the policies that would ensure developers build houses that adapt to potential higher temperatures	Noted.	None.
IM Land	V.4	Rising annual temperatures will result in an increased risk of overheating in buildings and buildings will need to be designed in accordance with the Cooling Hierarchy. In October 2019 the Government published two reports into overheating in new homes. These note a deficiency in the Building Regulations in how overheating assessments are carried out and the need to consider future climate scenarios. It is recommended that this section is updated once the latest Building Regulations are released to include reference to the UK Climate Projections 2018 (UKCP18) climate projections and the use of future climate scenarios in the assessment of development.	It is anticipated that the SPD will be reviewed if required as and when Building Regulations are updated.	None.
St Modwen Developments	V.4	Rising annual temperatures will result in an increased risk of overheating in buildings and buildings will need to be designed in accordance with the Cooling Hierarchy. In October 2019 the Government published two reports into overheating in new homes. These note a deficiency in the Building	It is anticipated that the SPD will be reviewed if required as and when Building Regulations are updated.	None.

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		<p>Regulations in how overheating assessments are carried out and the need to consider future climate scenarios. It is recommended that this section is updated once the latest Building Regulations are released to include reference to the UK Climate Projections 2018 (UKCP18) climate projections and the use of future climate scenarios in the assessment of development.</p>		
Shipston-on-Stour Town Council	V.4	<p>There will be a conflict between the suggested light coloured roofs and the visual impact on the landscape and also may conflict with the local vernacular that planning officers often require developers to conform with.</p>	<p>Agree that the matter of how to weigh the balance between design considerations and the need to adapt and mitigate the effects of climate change is important and reference to this will be made within the SPD.</p>	<p>Add a new paragraph 3 to Section V.8 (Climate Change Checklist) and amend paragraphs 4 and 5 to read:</p> <p><u>"As the evolution and use of mitigation and adaptation measures is rapidly growing across the UK, the ability for developments to respond to the impacts of climate change without compromising design quality is more achievable than ever. The aim is to create visually attractive sensitive development and to achieve an acceptable balance between good design and climate change measures.</u></p> <p><u>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. Given the critical importance of ensuring that new development addresses the effects of climate change, satisfying this requirement will be given high priority when considering site specific proposals. However, it is acknowledged that proposals affecting Listed Buildings may not be able to comply and in these Case</u></p>

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				<p>Officer discretion will be used as to what is feasible on a case-by-case basis. Guidance on how Part L (Energy Efficiency) of the Building Regulations can be applied to historic buildings is provided by Historic England in the following report: Energy Efficiency and Historic Buildings: Application of Part L of Building Regulations (2017)</p> <p><u>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. To assist applicants in the completion of the checklist, there are 3 separate checklists which identify the main mitigation and adaptation measures considered appropriate for that type of development."</u></p>
Welford-on-Avon Parish Council	V.4	<p>A programme of tree planting in all types of development will support adaptation to high temperatures. Developers (householder and commercial) must ensure no tree is cut down unless necessary and unless this had been mitigated and compensated for elsewhere in the development, or offsite through official carbon offsetting scheme. Therefore, we ask that all new developments should demonstrate if applicable, a zero net tree loss.</p>	<p>The SPD encourages tree planting within all new developments and states that existing trees should be retained on site where possible.</p> <p>It is considered that each development must be considered on an individual basis and whilst the removal of existing trees is discouraged, requiring mitigation and compensation for tree loss would go beyond the requirements of the Core Strategy and would be something to consider in the Core Strategy Review. Wording will however be added to Section V.6 to clarify that protected trees,</p>	<p>Amend wording to Paragraph 5 of Section V.6.2:</p> <p><u>"Trees should be incorporated into all major developments and also into minor developments where feasible. Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25</u></p>

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			<p>veteran trees and trees of public amenity value should not be removed from sites.</p> <p>Furthermore, additional wording will be added to V.6 to state that Minor and Major development proposals, unless otherwise agreed, should achieve biodiversity net gain.</p>	<p>dwellings per ha.); Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p>

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				<p>Amend second sentence of first paragraph of V.6:</p> <p>“Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England.”</p> <p>Amend wording to first paragraph of Section V.6.1.:</p> <p>“Opportunities to enhance biodiversity are available across all scales of development. <u>Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not possible. Warwickshire County Council Ecological Services have produced a Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, ‘offsetting’ will be sought in line with the Warwickshire County Council biodiversity offsetting programme.</u>”</p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>“It should be noted that the Environment Bill proposes to make biodiversity net gain a condition of all development</u></p>

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				<p><u>proposals with the exception of householder developments and some Brownfield sites. It is expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</u></p> <p>Add new information box to p. 25, Section V.6.1:</p> <p><u>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements, part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</u></p>
Alcester Town Council	V.4	Strongly supports the 5 Principles	Support is noted.	None.
V4.1. Shade and Ventilation				
Inland Waterways Association	V.4.1	Supports this section.	Support is noted.	None.
Sarah Price	V.4.1	Supports this section. States that we could add something about designing efficient hot water systems as these can increase internal heat gains which contribute to overheating (not just solar gains contribute to overheating)	Internal hot water systems would go beyond the remit of the planning system, and therefore would be outside of the scope of the SPD. However, the Council is committed to tackling climate change and your comments will be passed onto the Council's Climate Change Panel.	None.
Cllr Nigel Rock	V.4.1	Supports use of table but wonders if more specific guidance is needed. E.g. little evidence of use of brise-soleil or external shutter/blinds in the UK	The SPD includes the use of external blinds as an example of a measure that is encouraged in developments with large areas of	Amend wording to paragraph 5 of V.4.1: "New development proposals should integrate cooling features within their

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		<p>despite trends towards large windows. Maybe some examples or guidance for planners querying large southern aspect windows in designs (e.g. barn conversions, Class Q). Shading features such as those in central Germany may offer solutions in central England.</p>	<p>glazing. However, wording will be added to note that this is particularly important in southern facing windows.</p>	<p>design. Examples of such features include overhangs, external blinds, louvres and shutters. High performance glazing, such as low-e glass and smart glass will be encouraged in new developments where large areas of glazing are proposed, particularly to south facing aspects, so that the level of solar heat gain can be managed. The appropriateness of different types of cooling features will depend on the type, scale and location of the development proposed. It should be noted that the above list of potential cooling features is not exhaustive, and other forms of cooling measures are also available."</p>
A Jonathan Horsfield	V.4.1	Good to see the use of 'must'.	Noted	None
Facilities Integration Ltd	V.4.1	<p>This is the one "must" so far and most important. It should be moved earlier in the document as it is significant in its expectation. It is in non-dom that there needs to be a focus on upgrades. Current buildings regs expect 1k sqm as the lowest level for upgrade. You could impose a local planning expectation as for domestic that that all non-doms are in need for upgrade.</p> <p>Para.3 – there should be guidance on what 'exceptional circumstances' and 'robust justification' mean. Who adjudicates this? Unsure that a Planner is capable as I would need a specialist building mechanical engineer to advise.</p>	<p>It is considered that this section is appropriately located as the SPD is divided according to the 5 Principles.</p> <p>It is important to note that the wording within the SPD has to be in accordance with the policies of the Core Strategy and is not able to go above and beyond the requirements of the Core Strategy by providing additional policy. However, when the Core Strategy Review is undertaken – which is anticipated to commence later this year - existing policies can be reconsidered.</p> <p>Exceptional circumstances and robust justification would be judged</p>	None

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		<p>Para 4 – this is superfluous given para 3’s expectations.</p> <p>P.17 para 1 – back to ‘should’. If you expect a BREEAM standard this would be included anyway to achieve the level required.</p>	<p>by the Planning Officer and would be dependent on the individual development proposals and site circumstances.</p> <p>Paragraph 4 aims to clarify that householder applications will not be expected to follow the cooling hierarchy as this will not be possible or applicable in all householder applications, however they will be encouraged to consider the principle within the design of householder development proposals.</p>	
John Stott	V.4.1	<p>Suggest adding “which can be easily closed to preserve air tightness in cold weather” after reference to secure ventilation in principle 1 of Cooling Hierarchy.</p> <p>Suggests high performance glazing should be used in all new developments – “large area of glazing” is ill defined.</p>	<p>Noted. Wording will be added to reflect the need to provide insulation in colder months, so that additional heating is not required in winter.</p> <p>It is noted that ‘large area of glazing’ is not specific, however, it is considered that providing a specific area of glazing would need to be appropriately evidenced, and may also be affected by the nature of different sites and development proposals. As such, it is considered more appropriate to not provide a specific measurement so that consideration can take into account the specifics of each site and proposal.</p> <p>Whilst the use of high performance glazing will be encouraged, it is considered this should not be</p>	<p>Wording of Principle 1 of Cooling Hierarchy to be amended as follows:</p> <p>1. Passive design - using energy efficient design to reduce the amount of heat entering the building in the warmer months. This can be achieved through appropriate orientation, overhangs and shading, albedo, fenestration, insulation and green roofs. Heat can also be reduced within the building through high ceilings and exposed internal mass; however, provision must be made for night purging of heat through secure ventilation. <u>Such ventilation should be closable to preserve air tightness in cold weather.</u></p>

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			<p>required as it is considered a more flexible approach should be taken so that different types of measures can be taken where considered appropriate, using the checklists provided in the SPD so that a minimum amount of measures must be undertaken for each new development.</p>	
IM Properties	V.4.1	<p>Agree that future proofing the design of commercial developments to adapt to higher and more extreme temperatures is an important component of climate change adaptation.</p> <p>However, the District Council should note that adherence to Preferred Option 1 (passive design) and 2 (passive/natural cooling) is not suitable for all development, in particular office led and logistics buildings which are unheated and office spaces likely to be served by reversible heat pumps for both heating and cooling.</p> <p>The proposed development at Stratford 46 will have a range of uses where different heating and cooling regimes will be required. While elements of passive design can be used the use of active cooling will likely be required due to the nature of building uses. Occupier requirements are usually unknown at the planning stage and therefore meeting this requirement is likely to be difficult.</p>	<p>Noted. The SPD states that development proposals must use the preferred options 1 and 2 of the hierarchy, unless there are exceptional circumstances that make options 3 or 4 the only feasible methods of ventilation. We want to encourage the use of Options 1 and 2 of the Hierarchy, and consider that sufficient flexibility has been incorporated into the wording of the section to permit Options 3 and 4 in exceptional circumstances.</p>	None.

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		<p>It is recommended that this section includes flexibility for different development types expanding upon the criteria to justify exceptional circumstances for using Option 3 and 4. Such additional criteria could include having regard to the type of development involved (e.g. office and industrial) and its design.</p>		
Stephen Norrie	V.4.1	<p>The Cooling Hierarchy is problematic as it puts mechanical ventilation towards the bottom. However the Passivhaus system, generally reckoned to be best practice, relies on a form of mechanical ventilation to ventilate a near air-tight building. Therefore Passivhaus could be seen near bottom of CH when it should be at top.</p>	<p>The SPD states that development proposals must use the preferred options 1 and 2 of the hierarchy, unless there are exceptional circumstances that make options 3 or 4 the only feasible methods of ventilation. As such, where mechanical ventilation would form part of a low carbon development such as a Passivhaus system, it is considered that the wording of the SPD allows sufficient flexibility to not prevent such developments from coming forward.</p>	None.
V.4.2 Roofs and Paving				
A Jonathan Horsfield	V.4.2	<p>Para 3 last sentence – many people – retirees, single parents, those with disabilities and homeworkers – are more likely to be at home in the day time. Statement could be improved.</p>	<p>It is considered that overheating in homes has the potential to negatively affect people such as the elderly, retired and those with disabilities as climate change is creating increased summer temperatures.</p> <p>However, additional wording will be added to note that increased energy costs in winter may be an issue and homes should not be designed to be excessively cold in</p>	<p>Amend wording to paragraph 3 of Section V.4.2 as follows:</p> <p>“Cool roof materials are light in colour or have reflective properties, and can significantly reduce the solar heat gain produced by roofs by minimising the amount of light converted into heat and increasing the amount of heat that is radiated away from buildings. Whilst this can result in increased heating requirements for buildings in winter, the overall net outcome is positive as cool</p>

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			<p>winter as this may disadvantage the elderly and disabled who are more likely to be at home during the daytime.</p>	<p>roofs reduce the need for artificial cooling in summer. In comparison, solar heat gain in winter is usually less of a consideration as hours of direct sunlight are reduced, and residential heating requirements are not usually during the day when solar heat gain occurs. <u>However, in designing cool homes, applicants should note that this may result in increased energy costs in winter. Homes should not be designed to be excessively cold in winter as this may disadvantage the elderly and disabled who are more likely to be at home during the daytime."</u></p>
Facilities Integration Ltd	V.4.2	<p>The word 'cool' could be misunderstood. Doesn't understand what it means. We have hot and cold roofs. It would be better to use 'environmentally acceptable' or similar.</p> <p>There can be issues with promoting reflective surfaces on roofs – glare and its effect on highways etc. Reflective needs to be defined as solar reflective. Solar absorption is also use as one of the passive solar design criteria.</p> <p>Summer cooling, whilst necessary, is much less important than winter heating and you are already expecting methods included in V.4.1 to achieve this in a mandatory manner.</p> <p>There is too much detail for a planning document. It should just</p>	<p>It is considered that the meaning of 'cool' is widely understood in the context of temperature.</p> <p>The wording of reflective will be clarified to be mean solar reflective.</p> <p>It is considered that the detail contained in the document is</p>	<p>Amend wording of first sentence of Para 2 of Section V.4.2 to read:</p> <p>"Cool roof materials are light in colour or have <u>solar</u> reflective properties"</p>

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		<p>promote the principles and the expectation in conservation/conversion where there are few choices.</p> <p>Para 3 does not include reference to the reason for permeability in relation to ground water attenuation.</p>	<p>necessary in order to provide information for applicants and developers, so that they can be informed on the various potential measures available.</p> <p>Explanation of the link between permeable surfaces and cooling will be included within the wording.</p>	<p>Amend wording to paragraph 4 of Section V.4.2:</p> <p><u>“Cool pavements and hardstanding can be achieved by using permeable surfaces and light coloured materials. Permeable surfaces can cool local temperatures through the process of evapotranspiration, whilst light materials are more solar reflective and therefore absorb less heat”</u></p>
Delta Planning	V.4.2	<p>Whilst lighter coloured materials can have cooling properties, they can often be more visually prominent in certain landscapes. It is important that light coloured materials are used sympathetically and not in circumstances where darker and more recessive colours would be more visually appropriate.</p>	<p>Agree that the matter of how to weigh the balance between design considerations and the need to adapt and mitigate the effects of climate change is important and reference to this will be made within the SPD.</p>	<p>Add a new paragraph 3 to Section V.8 (Climate Change Checklist) and amend paragraphs 4 and 5 to read:</p> <p><u>“As the evolution and use of mitigation and adaptation measures is rapidly growing across the UK, the ability for developments to respond to the impacts of climate change without compromising design quality is more achievable than ever. The aim is to create visually attractive sensitive development and to achieve an acceptable balance between good design and climate change measures.</u></p> <p>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. Given the critical importance of ensuring that new development addresses the</p>

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				<p><u>effects of climate change, satisfying this requirement will be given high priority when considering site specific proposals. However, it is acknowledged that proposals affecting Listed Buildings may not be able to comply and in these Case Officer discretion will be used as to what is feasible on a case-by-case basis. Guidance on how Part L (Energy Efficiency) of the Building Regulations can be applied to historic buildings is provided by Historic England in the following report: Energy Efficiency and Historic Buildings: Application of Part L of Building Regulations (2017)</u></p> <p><u>The checklist is required to be completed and submitted with planning applications for certain householder, new build and conversion / change of use applications. To assist applicants in the completion of the checklist, there are 3 separate checklists which identify the main mitigation and adaptation measures considered appropriate for that type of development."</u></p>
Waterways Association	V.4.2	Supports this section	Noted	None
V.4.3 Green Infrastructure				
A Jonathan Horsfield	V.4.3	<p>Green Walls - Last sentence gives very little incentive to introduce green walls – needs strengthening or gives an easy out.</p> <p>Conservative manifesto included statement that all new residential roads would be tree lined. Use of 'unless' and 'where feasible' is a get</p>	The SPD is structured to give applicants choice as to which measures are considered most appropriate/feasible to implement within the context of each site/proposal. As a minimum, proposals must incorporate at least one suitable mitigation and	<p>Last sentence of Section V.4.3 to read:</p> <p><u>"Proposed landscaping should utilise appropriate native plants to the site. Non-native species may also be appropriate in some circumstances, dependent on species and specific site constraints".</u></p>

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		<p>out. Last sentence refers to native plants. Long lived trees and shrubs need to be selected as more likely to survive in a warming/maybe wetter climate – native or otherwise. Plants from further south in Europe may become common.</p>	<p>adaptation measure from each of the 5 principle areas:</p> <ul style="list-style-type: none"> • For non-householder new build developments over 20 square metres, at least 15 measures in total must be provided of which one measure will be the incorporation of renewable energy unless it is satisfactorily justified to be not possible • For conversion and change of use proposals at least 10 measures must be provided • For householder applications over 20 square metres at least 5 measures are expected. <p>Green walls are not intended to be mandatory, but one of the options that applicants can choose from the 5 different principles in the checklists.</p> <p>Wording will be adapted to reflect that certain non-native plants may also be appropriate.</p> <p>This section notes that trees should be included in street design. Additional wording will also be added to Section V.6 to state that developments should include trees to primary street frontages. This will also be added as one of the credits in the Checklist for Minor/Major developments to further encourage street tree planting.</p>	<p>Add additional paragraph 6 to Section V.6.2:</p> <p><u>Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.</u></p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p>

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Welford-on-Avon Parish Council	V.4.3	There are other types of Green Infrastructure to those mentioned. Consideration should be given to wetland areas, woodlands, wildlife areas, green bridges, wildflower verges and meadows, reedbeds, water retention etc. in the development. These have multiple benefits for climate, biodiversity and for residents and can be very low cost to developers.	The types of Green Infrastructure are not intended to be exhaustive, but to provide examples of types Green Infrastructure that are considered to be most suitable for new developments in the District. This section refers readers to other sources of information including Part M – Landscape Design and Trees of the SPD where more information can be found on the types of Green Infrastructure available.	None
Facilities Integration Ltd	V.4.3	<p>P 17 Para 1 – there need to be explanation of heat island effect earlier in document.</p> <p>P18 Para 1 – well done, another ‘must’. Unsure how to police it, however.</p> <p>P 18 trees and landscaping – should be rewritten around an expectation of a landscaping scheme with requirement for tree and shrub planting. Issues around the security of scheme with shrub planting that should be addressed. Would like to see the promotion of avenue planting.</p> <p>P19 para 3 refers “blue/green infrastructure” – needs a definition. Nowhere else is blue infrastructure referenced. Not sure about para’s viability for assessment – “will be considered favourably” is not guidance as rests with personal opinion of LA officer.</p>	<p>The SPD has been structured in sections and it is not possible to reference all concepts throughout the SPD without creating a very long document.</p> <p>Applicants will be expected to provide details of how green infrastructure will be maintained at the application stage. It is anticipated that conditions will be added to any planning permissions to ensure ongoing maintenance in perpetuity.</p> <p>A definition of blue infrastructure will be included in the glossary.</p> <p>It is agreed that wording for “considered favourably” should be removed, as it is unclear if it implies that this consideration should outweigh other factors and places a burden of assessment on Planning Officers.</p>	<p>Amend glossary to include definition of blue infrastructure:</p> <p><u>“Blue Infrastructure – Infrastructure involving water, for example, canals, ponds, wetlands, streams, rivers”</u></p> <p>Amend wording to p.19 as follows:</p> <p>“The Good Homes Alliance (July 2019) states that the level of blue/green infrastructure considered to have a beneficial effect on reducing temperatures is at least 50% cover, within a 100m radius from the site. As such, new developments <u>will be encouraged to meet this standard</u> which meet this standard will be considered favourably, although it will be most easily achieved within a rural context and in low-density developments. Green walls/roofs can also be included towards meeting this figure.”</p>

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Stephen Norrie	V.4.3	<p>This section should be reworded to say “trees should be incorporated into all development sites unless site constraints make this impossible, and existing trees should be retained <u>unless overwhelming reasons for their removal are presented</u>” Where a tree is removed, developers should provide for the planting, with the district, of saplings with a capacity to match the carbon sequestration of the removed tree, within a short period (e.g. a year and taking account of survival rates).</p>	<p>The SPD encourages tree planting within all new developments and states that existing trees should be retained on site where possible.</p> <p>It is considered that each development must be considered on an individual basis and whilst the removal of existing trees is discouraged, requiring mitigation and compensation for tree loss would go beyond the requirements of the Core Strategy and would be something to consider in the Core Strategy Review. The SPD encourages tree planting within all new developments and states that existing trees should be retained on site where possible.</p> <p>However, Section V.6 notes that the Environment Bill proposes to make provision for biodiversity net gain a condition of most planning permissions in England. It is expected that this will be adopted as national policy later this year. Additional wording will be added to the SPD to make it clear that Major and Minor developments are expected to demonstrate biodiversity net gain unless otherwise agreed, in line with the adopted Core Strategy and current practice.</p>	<p>Amend wording to Paragraph 5 of Section V.6.2:</p> <p>“Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so.</u> As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.). Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle</u></p>

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				<p><u>collision where near to vehicle routes and parking areas."</u></p> <p>Delete following credit from Checklists:</p> <p>"Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)"</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>"Trees incorporated into primary street frontages"</u></p> <p>Amend second sentence of first paragraph of V.6:</p> <p>"Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England."</p> <p>Amend wording to first paragraph of Section V.6.1.:</p> <p><u>"Opportunities to enhance biodiversity are available across all scales of development. Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not</u></p>

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				<p>possible. Warwickshire County Council Ecological Services have produced a Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, 'offsetting' will be sought in line with the Warwickshire County Council biodiversity offsetting programme."</p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>"It should be noted that the Environment Bill proposes to make biodiversity net gain a condition of all development proposals with the exception of householder developments and some Brownfield sites. It expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</u></p> <p>Add new information box to p. 25, Section V.6.1:</p> <p><u>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements , part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</u></p>
Strategic Catchment	V.4.3	Green/brown roofs – Severn Trent is supportive of developments utilising	Noted. The benefits of trees to SuDS will be noted within the Flood	Add new third paragraph to Section V.5.1 to read:

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Planner - Severn Trent		<p>G/B roof designs and is supportive of the wording used, particularly the added benefit of reducing storm water runoff.</p> <p>Trees and landscaping – supportive of this section, however note additional benefit to surface water drainage has not been mentioned. Would encourage you to include wording which promotes the planting and protection of trees as part of SuDS strategy. Supportive of inclusion of trees as part of surface water drainage strategies for both new developments and mitigation of flood risk in urban areas and would be supportive of inclusion of tree pits.</p>	Risk Section V.5.1, as this considered a more relevant section to note this than V.4.3 which is related to the cooling benefits of trees.	<p><u>“Trees, hedgerows and other vegetation also play an important role in improving surface water drainage in SuDS strategies. The planting of trees and hedgerows to support SuDS will be encouraged and existing trees and hedgerows should be retained on site unless there is overriding justification for their removal.”</u></p>
Inland Waterways Association	V.4.3	Supports this section	Support noted.	None
John Veasey	V.4.3	Supports this section. Very sensible ideas, but help from national government is required.	Support noted. The SPD accord with the current Development Plan and National Planning Policy.	None
Warwickshire Wildlife Trust	V.4.3	This section provides an opportunity to tie in with the walkability/permeability area by recognising that utilising trees and landscaping when creating pedestrian and cycle routes can ensure multiple benefits (in this case contributing to urban cooling)	Noted. Amended wording will be used to reflect this point.	<p>Amend wording of paragraph 4 of Trees and Landscaping p.18 to read:</p> <p>“Trees should also be included within street design, <u>pedestrian and cycle routes</u> to provide shading and temperature reduction to the surrounding area.”</p>
Warwickshire County Council - Flood Risk	V.4.3	Support this section. The FRM team support the inclusion of green roofs. Also believe the inclusion of blue roofs would be beneficial. Blue roofs are intended to store water and can act as attenuation storage, storing water for	Support noted. Blue roofs will be included within the Green Infrastructure section. The SuDS section will be amended to include reference to trees and to advise	<p>Amend wording of V.4.3, p.17-18 to read:</p> <p><u>“Green/Brown/Blue Roofs</u></p>

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		<p>irrigation, cooling of buildings or non-potable use within the building. Further design information regarding green/blue roofs can be found in SuDS Manual CIRIA C753. The inclusion of trees can also be linked with sustainable drainage as tree pits in public realm can help treat surface water run-off.</p>	<p>applicants to refer to the SuDS Manual CIRIA C753.</p>	<p>A Green Roof (or Biodiverse Roof) has seeds or plants introduced into the substrate of the roof at the time of construction. A Brown Roof is where the roof surface is left to self-vegetate. <u>Blue roofs store water and can act as attenuation storage, storing water for irrigation, cooling of buildings or non-potable use within the building.</u></p> <p>Green, brown <u>and blue roofs</u> can provide evaporative cooling, reducing the 'heat island' effect of built-up areas. They can also extend the life of the roof by shielding it from the harmful impact of UV rays. In addition, they can provide a more suitable surface for solar panels by providing a more consistent ambient temperature.</p> <p>Both green/brown/<u>blue roofs</u> and cool roofs lower surface and surrounding air temperatures, and decrease energy demand. However, green/brown/<u>blue roofs</u> also offer additional benefits such as filtering and reducing storm water run-off, enhancing biodiversity and reducing air pollution. <u>Blue roofs can also act as attenuation storage.</u></p> <p>All proposals for green, brown <u>and blue roofs</u> must demonstrate that sufficient and ongoing maintenance is available, as well as access to the roof to undertake the maintenance requirements."</p> <p>Add new paragraph 4 to V.5.1, p.21:</p>

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				<p>"Applicants will be encouraged to utilise SuDS guidance contained in the SuDS Manual C753, available at: https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx"</p> <p>Amend checklists items to include 'blue roofs' for V.7.3, V.6.3 and V.5.3.</p>
Canal & River Trust	V.4.3	Trees should be considered in public open space as well as within street design to provide shading and temperature reduction to the surrounding areas.	Noted. Wording will be amended accordingly.	<p>Amend wording to Section V.4.3:</p> <p>"Trees should also be included within street design <u>and public open space</u> to provide shading and temperature reduction to the surrounding area."</p>
Miranda Forrester	V.4.3	Supports this section. Requests lots more green walls.	Noted. It is hoped that the SPD will encourage the provision of more green walls within new developments, as one of the options encouraged in the SPD.	None.
V.5 Principle 4 – Mitigating Flood Risk				
The Inland Waterways Association (Warwickshire Branch)	V.5	Supports this section.	Noted.	None.
Cllr Nigel Rock	V.5	Against this section. Planning permission can fail to take account of cumulative effect of adjacent development sites regarding storm management. Both fluvial and pluvial issues. Constriction of ditches, effect of land features to channel water in extreme situations, flow from and into natural meadows and farm lands which interact with a development site can be omitted from the planning process. This must change – SPD	Noted. However, the SPD is intended to provide additional guidance to the existing Core Strategy - it is beyond the scope of the SPD to implement new policy. As such, these issues will be looked at during the Core Strategy Review, which is anticipated to start later this year.	None.

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		should ensure natural attenuation is not lost and flows not impeded. It must be accepted that measures may be required external to the developed area, or that constrain the degree of development.		
Anna Corser	V.5	A very good section. Should include tree planting.	Noted. Wording will be added to not the importance of trees and hedgerows in SuDS strategies.	Add new paragraph 3 to Section V.5.1 to read: <u>"Trees, hedgerows and other vegetation also play an important role in improving surface water drainage in SuDS strategies. The planting of trees and hedgerows to support SuDS will be encouraged and existing trees and hedgerows should be retained on site unless there is overriding justification for their removal."</u>
Welford-on-Avon Parish Council	V.5	Natural flood management measures are another very effective way of mitigating flood risk, for example 'slowing the flow' by increasing the resistance to surface (by planting trees and hedgerows, and installing leaky dams), and with more ambitious, multifunctional SuDS.	Noted. Wording will be added to note the importance of trees and hedgerows in SuDS strategies.	Add new paragraph 3 to Section V.5.1 to read: <u>"Trees, hedgerows and other vegetation also play an important role in improving surface water drainage in SuDS strategies. The planting of trees and hedgerows to support SuDS will be encouraged and existing trees and hedgerows should be retained on site unless there is overriding justification for their removal."</u>
Bidford-on-Avon Parish Council - Clerk	V.5	This is an essential consideration to the Parish of Bidford which is susceptible to flooding in Bidford, Broom, Barton and Marlcliff. The current policies are not strong enough and development have been granted planning permission and, only after	Noted. The SPD is not able to go above and beyond the current policies within the Core Strategy as it can only provide further guidance to these adopted policies, however the issues raised will be considered as part of the forthcoming Core Strategy review, which is	None

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		<p>the development has been built, have the problems arisen. Land to the South of Jacksons Meadow – the POS which was to be transferred to the Parish Council did not drain and the play equipment was surrounded by water until such time as the developer re-piped the site – the drainage system that had been approved was inadequate. Aspley Close – Bidford Road has now flooded twice and the Balancing Pond remained dry – it would paper that whatever piping system was installed to carry the excess water to the balancing pond is not working.</p> <p>A number of dwellings erected in the greenfield land between Victoria Road and Waterloo Road have resulted in the water of the brook rising fast and dwellings that had not flood before did so or were in danger of. Parish Council and Flood Group concerned that SuD put in place in all the new developments will manage to keep the village dry. Too many houses built in greenfield land in too short a time and with no accompanying infrastructure have made Bidford-on-Avon parish vulnerable to flooding and the LPA must take this seriously before it is out of control.</p>	<p>anticipated to commence later this year.</p>	
Shipston-on-Stour Town Council	V.5	<p>The SPD needs to be more specific on the long term management/maintenance of SuDS features, namely who this maintaining authority will be as there will be long-</p>	<p>Noted. The specifics of the maintenance arrangements will be decided at the Planning stage during the determination of planning applications, however</p>	<p>Insert additional wording to p.21, as follows: "Sufficient SuDS maintenance for the lifetime of the development should be</p>

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		<p>term financial implications. The SPD should specify at least a 10% improvement on the specified maximum run-off from new developments to further mitigate the impact of the development.</p>	<p>wording will be added to state that SuDS schemes for Major and Minor development should be accompanied by a maintenance schedule.</p> <p>Regarding specifying a certain level of improvement to run-off from new developments, it is considered that this would be beyond the scope of an SPD as it would be introducing new policy, which can only be done through specified Development Plan documents (i.e. the Core Strategy). As such, this is something we will consider during the Core Strategy Review, which is anticipated to commence later this year.</p>	<p>incorporated within all SuDS proposals. <u>Completed SuDS schemes for Major and Minor development should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.</u>"</p>
St Joseph Homes Limited	V.5	<p>Recognise the importance of mitigating flood risk and that this will increase in the context of a changing climate. Support the measures proposed within principle 4.</p>	<p>Your support is noted.</p>	<p>None</p>
Di Brennan	V.5	<p>There was no mention amongst 3 suggestions given, about not building the SWRR across a large area of flood plain – an area which has completely flood at least 3 times in 2019. It makes no sense given modern imperatives, and the act of faith that compensation chambers can mitigate the consequences of underground construction.</p> <p>Failure to mention the significance of flood plains to Stratford. As a minimum requirement, there should</p>	<p>The SWRR is outside of the scope of the SPD as it is a strategic infrastructure project. The SPD can only expand on and provide guidance to existing planning policy contained in our Core Strategy, so it cannot comment on the SWRR or mandate the location of new development. These are issues for the Core Strategy review, which is anticipated to commence later this year.</p>	<p>None</p>

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		be no large scale construction on flood plain, especially Category 3.	We would also refer you to the adopted Core Strategy policy CS.4, which sets out restrictions on development within the Floodplains in line with Environment Agency guidelines and the NPPF	
Adrian L Kenyon	V.5	<p>Any development in the flood plain should not be allowed within a prescribed distance from a river or water course and beyond that prescribed distance only if built in effective flood defences are agreed with the relevant Statutory Body with regular inspections carried out during installation on completion a Statutory Certificate of Compliance should be issued before any house or houses can be sold or inhabited.</p> <p>Ditches should be maintained by owners with an annual inspection required and financial penalties assessed against owners who do not comply. Rivers should be regularly dredged as they used to be.</p>	<p>Noted. The SPD is not able to go above and beyond the current policies within the Core Strategy as it can only provide further guidance to these, however the issues raised will be something for consideration as part of the forthcoming Core Strategy review, which is anticipated to commence later this year.</p> <p>We would also refer you to the adopted Core Strategy policy CS.4, which sets out restrictions on development within the Floodplains in line with Environment Agency guidelines and the NPPF.</p> <p>The Council is committed to tackling climate change and your comments will also be passed onto the Council's Climate Change Panel.</p>	None
Miranda Forrester	V.5	A problem for the rural parts of SDC are blocked ditches. Frequently they are left with debris in them and water backs up. SDC should be aware of the crucial network of ditches, have a list of who is responsible for them and check that they are maintained. Run off from the fields and mud off tractor	<p>The maintenance of ditches is not a planning consideration, and it is therefore beyond the scope of this SPD to regulate ditch maintenance.</p> <p>The Council is committed to tackling climate change and your comments will also be passed onto</p>	None

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		and car tyres collect in the gully grates on the side of roads and these then get blocked. It is important they are cleared on a regular basis.	the Council's Climate Change Panel.	
Environment Agency - Sustainable Places	V.5	<p>In line with National Policy we wish to see a sequential approach to all new development directed away from those areas at highest flood risk i.e. towards Flood Zone 1 in line with Policy CS.4. Any new development or works that take place should have a positive effect on flood risk and the conveyance of water throughout the channel. Opportunities to reduce flood risk should be explored in all new development proposals and ensure designs are appropriately flood resistant and resilient. The EA proposes a number of additional factors which should be included in the SPD:</p> <ul style="list-style-type: none"> - Updated Level 1 SFRA – advise referring to this document if the SFRA identifies any sensitive flood risk areas particularly in relation to climate change. Particularly if cumulative impacts of future development could make local areas susceptible to flooding under NPPF Para.159 - Climate Change Allowances – the EA has updated their guidance on how climate change could affect flood risk to new developments. There is increased emphasis on flood 	<p>Policy CS.4 requires the sequential approach to be followed for new development. It also states that development will not be permitted where it results in an increase in the risk of flooding elsewhere.</p> <p>Strategic planning considerations, such as the location of new development, will be controlled through our Core Strategy and the NPPF. The SPD can only provide guidance to existing planning policies. As such, strategic planning considerations such as the SFRA are addressed in our adopted Core Strategy and will be reconsidered within our Core Strategy Review, which is anticipated to commence later this year.</p> <p>Wording will be added to encourage applicants to use the highest level of climate change allowance, where applicable to the development proposed.</p> <p>Flood defence schemes are a strategic planning issue which are dealt with in our Core Strategy and our forthcoming Core Strategy review; the SPD can only provide</p>	<p>Amend wording to Section V.5.3:</p> <p><u>V.5.3 Green Infrastructure and Permeable Surfaces Flood Risk Design Principles for New Development</u></p> <p>The landscaping of new developments should be designed to respond to both the increased likelihood of drought and flooding as a result of climate change.</p> <p>Permeable surfaces should be used for all hardstanding, driveways and paved areas in new development to allow for enhanced drainage of surface water.</p> <p>Green roofs will be encouraged as an appropriate method of reducing and filtering storm water run-off from buildings; blue roofs are also an effective method of storing excess water.</p> <p><u>For developments where a Flood Risk Assessment is required, applicants must consider the climate change allowances for peak river flow, peak rainfall intensity and floodplain compensation. Where applicable, applicants will be encouraged to use the highest level of climate change allowance identified for the time period covering the lifetime of development, based on the appropriate River Basin serving the development. Further information is available at:</u></p>

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		<p>risk vulnerability classification of proposed development. For some development types and locations, two possible climate allowances are given and it is the higher of these which should be used in assessment and mitigation work. Particularly if these areas are identified as particularly sensitive to fluvial flood risk from your SFRA.</p> <ul style="list-style-type: none"> - Additionally, climate change allowances for floodplain compensation have been updated. In the majority of cases use the higher central allowance to calculate floodplain storage compensation and it is for the developer to demonstrate a lower allowance should be used. - Flood Defence Schemes – any land which is required, or likely to be required, for a current or future Flood Risk Management Scheme should be safeguarded from future development as stated in NPPF para 157. Third party external funding toward flood risk management scheme should be sought from development within the SPD area to support the catchment wide approach to reducing flood risk which is projected to 	<p>guidance to existing policies, and cannot create new strategic policy.</p> <p>Wording will be added to require 8m easements to watercourses/flood defences and encourage greater buffers of 20m, where appropriate.</p> <p>Wording will be included to discourage the use of stilts in new development.</p> <p>An additional credit will be added to the checklist for Major and Minor Developments, and the checklist for Conversion and Change of Use Developments for developments using the highest level of climate change allowance for the current or future time periods.</p>	<p>https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p> <p><u>In line with Environment Agency advice, new development should maintain at least an 8m easement between any built development and the top of the bank of a watercourse and/or the toe of a flood defence to allow for maintenance and inspection requirements. Greater buffers of 20m are preferred as they can allow for access for larger maintenance works, minimise future impacts on flood flow routes, and account for the natural movement of watercourses during a developments lifetime. The suitability of a 20m buffer is dependent on several factors, including but not limited to:</u></p> <ul style="list-style-type: none"> - <u>the size of the watercourse;</u> - <u>whether there are existing flooding issues from the watercourse in the vicinity of the site;</u> - <u>the anticipated change to watercourse flows over time;</u> - <u>the size of the development site</u> - <u>whether there are alternative means to access the watercourse in the vicinity of the site</u> - <u>whether there are any flood defence works planned in the vicinity of the site</u> <p><u>Where a 20m buffer is considered appropriate and beneficial to the flood risk management of the site and will help reduce flood risk to the proposed development and/or surrounding area, these will be encouraged.</u></p>

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		<p>increase as result of climate change.</p> <p>The EA is strongly encourages developer led schemes to manage the effects of flood risk and climate change.</p> <ul style="list-style-type: none"> - Easement – development should maintain an 8m easement between development and the top of the bank of watercourses and the top of flood defences to allow for maintenance and inspection requirements. The EA strongly encourages greater buffers (20m) as standard to allow for access to larger maintenance works, to minimise future impacts on flood flow routes, and to account of the natural movement of watercourses during a developments lifetime. - Stilts – the use of stilts from a fluvial flood risk perspective is not appropriate. Areas under stilts are often used as storage spaces and have the potential to become blocked during flood events which will have a cumulative impact in terms of flood risk. Therefore, we recommend including a section within the SPD discouraging the use of stilts in the design 		<p><u>Buildings with stilts should not be used as a flood management method. Areas under stilts are often used as storage spaces and have the potential to become blocked during flood events which will have a cumulative impact in terms of flood risk.</u></p> <p>An additional credit will be added to the checklist for Major and Minor Developments, and the checklist for Conversion and Change of Use Developments, as follows:</p> <p><u>“Using the highest level of climate change allowance for the time period covering the lifetime of the development”</u></p>

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		<p>principle for developments at risk of flooding.</p> <p>Recommend read full response.</p>		
V.5.1 SuDS				
Welford-on-Avon Parish Council	V.5.1	<p>SuDS must be high quality and well designed. In most new developments, SuDS are designed out during the planning process, leaving the development with low quality measures (for example a dip in the ground which results in a fenced-off pond). SuDS should be integrated into the development from the outset and be multi-functional (e.g. playgrounds)</p>	<p>Noted. It is the intention of the SPD that any SuDS will be of high quality, and the SuDS Manual C753 will be referenced in the document to encourage applicants to design SuDS to a high specification.</p> <p>The SPD specifies that SuDS should be integrated within development proposals at the design stage and incorporated into proposals at the earliest stage.</p> <p>Not all proposals will be able to make SuDS multifunctional, however a sentence will be included to encourage this in the SPD where safe to do so.</p>	<p>Add new paragraph 4 to V.5.1, p.21:</p> <p><u>"Wherever feasible and safe to do so, SuDS provided should be multifunctional in nature. For example, SuDS can also be used as features within playgrounds, recreation areas or landscaping within a development."</u></p> <p>Add new paragraph 5 to V.5.1, p.21:</p> <p><u>"Applicants will be encouraged to utilise SuDS guidance contained in the SuDS Manual C753, available at: https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx"</u></p>
Facilities Integration Ltd	V.5.1	<p>Many of the 'shoulds' rely on good knowledge of geotech, ground form and capacity. How is this to be achieved by a householder? Concerned that without advice you could be promoting local flooding where the subsoil is in our area largely clay.</p>	<p>Noted. Additional wording will be added to state that SuDS should be designed in accordance with the SuDS Manual CIRIA (C753) as recommended by Severn Trent. SuDS will be assessed during the planning application stage, so any potential adverse implications will be assessed at this point.</p>	<p>Amend wording to first paragraph of V.5.1. p.21:</p> <p><u>"New development proposals should integrate SuDS at the design stage of site layouts, ensuring that they are incorporated into the proposals at the earliest stage. <u>The type of SuDS that may be appropriate will depend on the type and location of the development proposed. All schemes for the inclusions of SuDS should demonstrate high quality design and that the proposed SuDS and development will fit into the existing landscape.</u></u></p>

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				<p>Add new paragraph 2 to V.5.1:</p> <p><u>Good SuDS design can be key for creating a strong sense of place and pride in the community for where people live, work and visit, making the surface water management features an integral part of developments.</u></p> <p>Add new paragraph 5 to V.5.1, p.21:</p> <p><u>Applicants will be encouraged to utilise SuDS guidance contained in the SuDS Manual C753, available at: https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx</u></p>
Strategic Catchment Planner - Severn Trent	V.5.1	Supportive of SuDS policy and wording provided particular for new developments. SuDS are most effective way of managing surface water flows whilst being adaptable to the impacts of climate change and providing wider benefits around water quality, biodiversity and amenity. We would also note that inclusion of SuDS as mitigation in areas already at risk of flooding would be beneficial especially if it can increase the resilience of the foul sewer network to storm conditions through the removal of surface water connections. We are looking to incorporate SuDS into our flood risk solutions. We would encourage you to further develop your policy wording to strengthen this section by including the following policy wording:	Noted. Additional wording will be included to reflect suggested wording, including maintenance requirements and to refer applicants to the SuDS Manual, CIRIA (c753) to provide guidance on how SuDS should be designed.	<p>Amend wording to first paragraph of V.5.1. p.21:</p> <p><u>“New development proposals should integrate SuDS at the design stage of site layouts, ensuring that they are incorporated into the proposals at the earliest stage. The type of SuDS that may be appropriate will depend on the type and location of the development proposed. All schemes for the inclusions of SuDS should demonstrate high quality design and that the proposed SuDS and development will fit into the existing landscape.</u></p> <p>Add new paragraph 2 to V.5.1:</p> <p><u>Good SuDS design can be key for creating a strong sense of place and pride in the community for where people live,</u></p>

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		<p>“ All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate. All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape. The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity. Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.”</p> <p>The supporting text for the policy should also include: “Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the</p>		<p><u>work and visit, making the surface water management features an integral part of development.”</u></p> <p>Add new paragraph 5 to V.5.1. p.21:</p> <p><u>SuDS should follow the Drainage Hierarchy within National Planning Policy Guidance, as follows:</u> <u>1)Into the ground (infiltration)</u> <u>2) to a surface water body;</u> <u>3) to a surface water sewer, highway drain, or another drainage system;</u> <u>4) to a combined sewer</u></p> <p>Add new paragraph 6 to V.5.1. p.21:</p> <p><u>“Applicants will be encouraged to utilise SuDS guidance contained in the SuDS Manual C753, available at:</u> https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx”</p> <p>Insert additional wording to p.21, as follows:</p> <p><u>“Sufficient SuDS maintenance for the lifetime of the development should be incorporated within all SuDS proposals. Completed SuDS schemes for Major and Minor development should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.”</u></p>

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		surface water management features as much a part of the development as the buildings and roads.”		
Di Brennan	V.5.1	<p>Amongst the 3 sections there was no mention of not building a major construction across 4 valuable wildlife corridors, or not constructing a huge bridge which will endanger the flight of Stratford’s swan population.</p> <p>No mention of protecting existing wildlife corridors. Recognised wildlife corridors should not be built across/intersected.</p>	Comments noted. In relation to protecting existing wildlife corridors, Core Strategy policies CS6 (Natural Environment) and CS7 (Green Infrastructure) set out the Council’s approach to the protection of existing assets.	<p>Add new sentence at the end of the first paragraph under V.6 to read:</p> <p><u>“Core Strategy policies CS.6 (Natural Environment) and CS.7 (Green Infrastructure) set out the Council’s approach to conserving and enhancing existing biodiversity assets and the creation of new biodiversity provision.”</u></p>
Shipston Area Flood Action Group	V.5.1	<p>The requirement that site run-off should be flood neutral for 10+ properties should be changed to incorporate all developments, or if too onerous, in excess of 4 properties.</p> <p>The current requirement for ‘flood neutrality plus climate change’ for larger developments is not ambitious enough – should be a requirement for betterment – at least 25% betterment plus climate change. This is achievable as evidenced by the agreement of CALA, Taylor Wimpey, Cameron Homes and other who have done significant new developments in/around Shipston who through discussion and negotiation with SATAG and Town Council and agreed betterment between 25-40%</p>	Noted. The SPD cannot provide additional policy, and can only provide additional guidance/clarification to existing planning policy either within the Core Strategy or NPPF. However, this can be reviewed during our forthcoming Core Strategy review, which is anticipated to commence later this year.	None.
Environment Agency - Sustainable Places	V.5.1	Welcome the inclusion of SuDS as part of Principle 4 due to multiple benefits they provide alongside flood risk mitigation. Climate change will	Noted. The SPD states that all new development proposals should integrate SuDS, including householders where possible.	None.

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		<p>result in increased peak rainfall and peak river level, therefore all new development including infill and small-scale should incorporate SuDS to reduce flood risk, manage surface water and ensure that runoff does not increase risk of flooding elsewhere.</p> <p>In our Strategic Overview role we welcome introduction of green streets, rain gardens and swales to reduce surface runoff, improve water quality and improve local amenity value.</p>		
Warwickshire County Council - Flood Risk	V.5.1	<p>Strongly support the SuDS policy. We promote the use of SuDS to mitigate current and future flood risk and this policy gives additional emphasis to core strategy policy in line with our guidance. Additional comments to strengthen the policy:</p> <ul style="list-style-type: none"> - Recommend reference to the SuDS Manual CIRIA C753 especially for minor and householder applications where specific drainage consultants may not be employed. Highlight that many source control SuDS can still be used even where ground conditions do not allow infiltration, providing a viable outfall is available. The drainage hierarchy from Planning Practice Guidance. Connections to foul sewers are not allowed for in the hierarchy and increase the risk of flooding. This risk will only increase with 	<p>Noted. Reference to the SuDS Manual CIRA (C753) will be included within the SPD wording.</p> <p>Wording will be included to note that SuDS should follow the drainage hierarchy.</p>	<p>Amend wording to first paragraph of V.5.1. p.21:</p> <p><u>"New development proposals should integrate SuDS at the design stage of site layouts, ensuring that they are incorporated into the proposals at the earliest stage. The type of SuDS that may be appropriate will depend on the type and location of the development proposed. All schemes for the inclusions of SuDS should demonstrate high quality design and that the proposed SuDS and development will fit into the existing landscape.</u></p> <p><u>Good SuDS design can be key for creating a strong sense of place and pride in the community for where people live, work and visit, making the surface water management features an integral part of development."</u></p> <p>Add new paragraph 5 to V.5.1. p.21:</p>

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		<p>climate change and as such connections to foul or combine sewers does not adapt and mitigate climate change impacts. Connection to foul or combined sewers also may mean that surface water is unnecessarily pumped and treated at sewage works as part of the foul system. This uses more energy and contributes to emission unnecessarily. Core Strategy policy CS.4 also states that existing sewer connection should be removed where possible, we would advocate not creating new connections to adapt to climate change would be in keeping with the core strategy policy CS.4.</p> <ul style="list-style-type: none"> - Further document provided for advice in response. 		<p>"SuDS should follow the <u>Drainage Hierarchy within National Planning Policy Guidance, as follows:</u></p> <ol style="list-style-type: none"> <u>1) Into the ground (infiltration)</u> <u>2) to a surface water body;</u> <u>3) to a surface water sewer, highway drain, or another drainage system;</u> <u>4) to a combined sewer"</u> <p>Add new paragraph 6 to V.5.1. p.21:</p> <p>"<u>Applicants will be encouraged to utilise SuDS guidance contained in the SuDS Manual C753, available at: https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx"</u></p>
V.5.2 Water Efficiency and Rainwater Harvesting				
Inland Waterways Association	V.5.2	Supports this section.	Support is noted.	None.
Strategic Catchment Planner - Severn Trent	V.5.2	Supportive of water efficient measures being planned from the design of new development and encouragement to install water butts where appropriate. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering	Noted. The SPD states that non-residential developments will be expected to achieve a minimum 'good' BREEAM standard in accordance with the Core Strategy policy CS.4, meaning at least 12.5% reduction in water use should be achieved. The SPD can only provide additional guidance to Core Strategy policies. As such, requiring an additional water	Amend wording to V.5.2 p.22, new paragraph 5: " <u>In addition to the requirement for non-residential developments to meet the BREEAM 'Good' standard for water efficiency, all development proposals will be encouraged to meet the optional higher water efficiency requirement of Part G of Building Regulations, and not exceed 110 litres/person/day."</u>

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		<p>against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We encourage the inclusion of the following policy wording which is supported by NPPF 2018 Paragraph 149:</p> <p>“Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures.”</p>	<p>efficiency target for all development proposals would not be in accordance with Core Strategy policy, which only requires water efficiency measures sufficient to meet BREEAM ‘Good’ standard in non-residential developments. However, additional wording will be added to encourage all developments to adhere to the higher Building Regulations standard.</p>	
IM Land	V.5.2	<p>The UKCP18 climate projections state UK rainfall will decrease during the summer as a result of climate change, improving the water efficiency of new development is therefore important. IM is committed to reducing water consumption of new development and it is therefore recommended that additional evidence is provided to make of the Building Regs higher water efficiency standard for new residential development. In addition it is recommended that a target for non-residential development is included from the BREEAM Water Efficiency</p>	<p>Noted. The SPD states that non-residential developments will be expected to achieve a minimum ‘good’ BREEAM standard in accordance with the Core Strategy policy CS.4, meaning at least 12.5% reduction in water use should be achieved .The SPD can only provide additional guidance to Core Strategy policies. As such, requiring an additional water efficiency target for all development proposals would not be in accordance with Core Strategy policy, which only requires</p>	<p>Amend wording to V.5.2 pg 22, new paragraph 5:</p> <p><u>“In addition to the requirement for non-residential developments to meet the BREEAM ‘Good’ standard for water efficiency, all development proposals will be encouraged to meet the optional higher water efficiency requirement of Part G of Building Regulations, and not exceed 110 litres/person/day.”</u></p>

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		criteria, i.e. 2 Wat01 credits equivalent to a 25% reduction in non-residential water consumption.	water efficiency measures sufficient to meet BREEAM 'Good' standard in non-residential developments. However, additional wording will be added to encourage all developments to adhere to the higher Building Regulations standard.	
St Modwen Developments	V.5.2	The UKCP18 climate projections state UK rainfall will decrease during the summer as a result of climate change, improving the water efficiency of new development is therefore important. IM is committed to reducing water consumption of new development and it is therefore recommended that additional evidence is provided to make of the Building Regs higher water efficiency standard for new residential development. In addition it is recommended that a target for non-residential development is included from the BREEAM Water Efficiency criteria, i.e. 2 Wat01 credits equivalent to a 25% reduction in non-residential water consumption.	Noted. The SPD states that non-residential developments will be expected to achieve a minimum 'good' BREEAM standard in accordance with the Core Strategy policy CS.4, meaning at least 12.5% reduction in water use should be achieved. As such, requiring an additional water efficiency target for all development proposals would not be in accordance with Core Strategy policy, which only requires water efficiency measures sufficient to meet BREEAM 'Good' standard in non-residential developments. However, additional wording will be added to encourage all developments to adhere to the higher Building Regulations standard.	Amend wording to V.5.2 p.22, new paragraph 5: <u>"In addition to the requirement for non-residential developments to meet the BREEAM 'Good' standard for water efficiency, all development proposals will be encouraged to meet the optional higher water efficiency requirement of Part G of Building Regulations, and not exceed 110 litres/person/day."</u>
Facilities Integration Ltd	V.5.2	p.22 para 3 suggests non-doms are to achieve a BREEAM Good standards. This is not mentioned as a requirement earlier and you cannot cherry pick – either head for the whole standard or not at all.	Noted. The requirement for BREEAM 'Good' standard reflect the requirements in the Core Strategy for all new non-residential development to achieve the 'Good' standard in energy and water efficiency measures. However, it is noted this may not be clear, so	Amend wording to Paragraph 3, page 22 to read: "In accordance with the requirements of Core Strategy Policy CS.4 (Water Environment and Flood Risk), non-residential developments will be expected to achieve a minimum 'good' BREEAM standard. <u>This standard requires a</u>

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		Para 4 adds to the confusion – consideration at Planning stage or planning stage? Too much information	<p>additional wording will be added to clarify.</p> <p>Paragraph 4 – wording will be amended to clarify this is intended to mean that this should be considered at the earliest stage.</p>	<p><u>minimum level of water consumption improvements over baseline usage.”</u></p> <p>Amend wording of Paragraph 4, page 22 to read:</p> <p>“Low carbon rainwater harvesting and/or greywater recycling systems will be supported within new developments as a method to increase water efficiency. These options need to be properly considered at the planning <u>earliest possible stage in the design process</u> to determine whether a dual pipework system is required.”</p>
A Jonathan Horsfield	V.5.2	Para 2 – ‘should’ ‘where appropriate’ – be more certain please.	The wording has been chosen to reflect the fact that there may be instances where the implementation of water butts would be inappropriate, for example in apartments without gardens where rainwater would not be used; or where a householder development already has water butts. Using ‘must’ would mean that there would be no possible circumstances where development proposals would not be required to install water butts, and therefore, is considered inappropriate language in this instance as there will be some residential developments where it will not be appropriate to insist upon them.	None
Peter Chaddock	V.5.2	Supports this section. With appropriate roofing/guttering materials (e.g. zinc) and storage tanks of sufficient capacity, rainwater	Noted. This section of the SPD already supports low carbon rainwater harvesting and greywater recycling systems and it is not	Amend wording to paragraph 2 of V.5.2 as follows:

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		<p>can be successfully harvested for internal household use. Mechanical filters combined with in-line UVC light sanitization units can achieve higher level of potability than tap water. A dedicated drinking/cooking water spigot should have an activated carbon filter. All wastes except toilet should be captured via a grey water system stored in separate tanks and used for secondary tasks e.g. car washing, garden, toilets etc. Water butts are a bit pointless as they overflow during winter and then become inadequate during the growing season. Adequately sized rainwater storage tanks would make a significant contribution to buffering the deluges, reducing the volume of run-off and mitigating flooding.</p>	<p>considered necessary to go into specific details of what these could involve as there are numerous options which would be too lengthy to explore in full within the SPD. Water butts are considered to be a low cost way to improve water efficiency in developments, however additional wording will be added to also encourage rainwater collection tanks.</p>	<p>“<u>Rainwater collection facilities such as communal rainwater tanks and water butts</u> should be installed in all residential developments and householder developments where appropriate.”</p> <p>Amend checklist items for Minor/Major developments and Conversion/Change Of Use developments:</p> <ul style="list-style-type: none"> • Rainwater collection • Communal rainwater collection and reuse points/<u>water butts</u>
Delta planning	V.5.2	<p>Water butts should be installed in all residential and householder developments where appropriate. We support this approach as a relatively low cost means of introducing sustainable drainage and small-scale rainwater harvesting methods.</p>	Support is noted.	None.
V.5.3 Green Infrastructure and Permeable Surfaces				
Strategic Catchment Planner - Severn Trent	V.5.3	<p>Severn Trent is supportive of the comments on permeable surfaces in new developments, this can provide a valuable reduction in the risk of flooding from surface water and can form part of a wider site SuDS strategy.</p>	Support is noted.	None.
IM Land	V.5.3	<p>The use of permeable surfaces is a potential Sustainable Drainage System, however its use is dependent</p>	Noted. However, the SPD states that permeable surfaces should be used, not that they must be used.	None.

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		<p>on the permeability of the development area in question. The Government regulations related to flood risk and surface water drainage provide information on the design of surface water drainage systems, including the use of climate change allowances. Whilst the use of permeable surfaces is supported by IM it will not always be appropriate. It is therefore recommended this section is updated to 'encourage' the use of permeable surfaces rather than require their use.</p>	<p>As such, it is considered that this wording provides sufficient flexibility if, in some cases, it can be demonstrated it is not appropriate. Changing the wording to 'encourage' the use of permeable surfaces would not be strong enough to ensure they are used wherever possible.</p>	
Facilities Integration Ltd	V.5.3	<p>P23 Why are standards that must already be applied in respect of rainwater attenuation no referred to? No reference to existing national planning guidance in SPD.</p> <p>P24 too repetitive.</p>	<p>The SPD is intended to provide additional guidance to adopted Core Strategy and national planning policy, it is not considered necessary to repeat all existing policy within the SPD itself as it should be read in conjunction with the adopted Development Plan.</p> <p>Green/blue roofs are considered an effective method to reduce and filter storm water run-off, as well as water storage in the case of blue roofs. Therefore, it is considered that their inclusion in this section of the SPD is justified.</p>	None.
Warwickshire Wildlife Trust	V.5.3	<p>Greater emphasis should be placed on development considering the impact on the natural mitigation to extreme weather events which is diminished due to poor design) e.g. houses built on flood plain). More consideration should be taken as to how development could be designed to</p>	<p>The location of new housing will be covered in our Core Strategy and will be reviewed in the Core Strategy Review, which is anticipated to commence later this year. It is not within the scope of the SPD to create strategic housing policy or flood</p>	<p>Add additional paragraph 4 to Section V.5.3, p.24:</p> <p><u>"For developments where a Flood Risk Assessment is required, applicants must consider the climate change allowances for peak river flow, peak rainfall intensity and floodplain compensation. Where</u></p>

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		<p>work with existing natural processes to minimise impact of flooding.</p> <p>The points in the SPD all relate to dealing with or trying to avoid the problem at the critical point (household/road level). Reference could be made to the benefits of river catchment scale consideration (i.e. SDC identifying red line lines where development cannot take place due to the functionality of the landscape to help with flood mitigation or need to maintain the green corridor for other reasons such as pedestrian/wildlife highways). Natural flood management delivered outside of the site but linked via CIL or Biodiversity Offsetting could help manage impact of flooding at source rather than downstream in urban area.</p>	<p>mitigation/management on the strategic level. These matters will be considered during the Core Strategy review. However, wording will be added to state that applicants must consider the climate change allowances and use the highest level of climate change allowance where applicable to the development proposed. Wording will also be added to note that Major and Minor developments will be expected to achieve biodiversity net gain, using Biodiversity Offsetting where required.</p>	<p><u>applicable, applicants will be encouraged to use the highest level of climate change allowance identified for the time period covering the lifetime of development, based on the appropriate River Basin serving the development. Further information is available at: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</u>"</p> <p>Amend second sentence of first paragraph of V.6 p.25:</p> <p>"Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England."</p> <p><u>Amend wording to first paragraph of Section V.6.1.:</u></p> <p><u>"Opportunities to enhance biodiversity are available across all scales of development. Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not possible. Warwickshire County Council Ecological Services have produced a Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, 'offsetting'</u></p>

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				<p>will be sought in line with the <u>Warwickshire County Council biodiversity offsetting programme.</u>"</p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>"It should be noted that the Environment Bill proposes to make biodiversity net gain a condition of all development proposals with the exception of householder developments and some Brownfield sites. It expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</u></p> <p>Add new information box to p. 25, Section V.6.1:</p> <p><u>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements , part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</u></p>
Waterways Association	V.5.3	Supports this section.	Support is noted.	None.
Warwickshire County Council - Flood Risk		Strongly supports this topic and linkage to SuDS. CIRIA have produced a tool called the B£ST tool for aiding monetising the benefits of blue-green infrastructure using the natural capital model. The tool can be used to assess how SuDS feature contribute to the four pillars of water	Support is noted. An additional 'information box' will be added to Page 24 to encourage the use of the CIRIA B£ST tool.	<p>Add information box to page 24, text to read:</p> <p><u>"CIRIA have produce a tool called the 'B£ST tool' which can be used to calculate the monetary values of blue/green infrastructure. The tool can be used to assess how SuDS feature contribute to</u></p>

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		quantity, water quality, biodiversity and amenity value. Too can demonstrate how SuDS have helped achieve a number of aims within the SPD.		the four pillars of water quantity, water quality, biodiversity and amenity value. It is available to download here: https://www.susdrain.org/resources/best.html
Irene Beever	V.5.3	If this policy had been in force years ago we would not have the flooding problems we now see. Permeable surfaces are absolutely essential in rural areas but rarely installed. I hope in future this is mandatory not just advisory.	Noted.	None
Delta Planning	V.5.3	Permeable surfaces should be used for all hardstanding, driveways and paved areas in new developments. Standard tarmac road and pathway surfacing would not be permeable. Whilst there are benefits in using permeable surfacing in new developments, permitted development rights would allow for the installation of non-permeable hard standings, subject to scale and suitable drainage systems and any materials used in the repairs or alterations to hardstandings and roadways would not be controlled by the same planning requirements for porous surfacing.	<p>It is agreed that a positive difference can be made through requiring permeable surfaces to be used in those developments which do require planning permission. The Council cannot control what property owners do under permitted development but the intention is that this SPD will provide guidance and illustrate the benefits of using permeable surfacing.</p> <p>In terms of applying measures to roadways, it would be beneficial to include reference to other public sector partners applying the principles within this SPD wherever possible.</p>	<p>Add new section V.2 (Retrofitting into existing buildings) to set out how measures such as permeable surfacing can be incorporated into existing developments and an indication as to which measures may be permitted development.</p> <p>Add new paragraph in Section V.1 to read; <u>"Many of these principles apply not only to new development but also to other types of schemes promoted by local authorities and other agencies, such as public parks, playing fields and transport projects. As such it is expected that the principles and measures set out within this document will be applied to a wide range of other schemes wherever possible."</u></p>
Alcester Town Council	V.5.3	Strongly supports the 5 Principles	Support is noted.	None.

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V6. Principle 5				
Cllr Nigel Rock	V.6	The Council should take a firm stance against hedge removal in both agricultural and agricultural land converted to other uses, retaining hedges within development plans, particularly where these are ancient features. Although there may be national guidance, often this is abused to remove growth to ground level under excuse that if the root line remains it is not removal. This SPD should clarify the Council's objective is the retention of all function of the hedge in history, geography and ecology.	Noted. Wording will be added to state that developments should retain existing native hedgerows.	Amend wording to paragraph 6 of V.6.2, page 26: " <u>Development proposals should retain native species hedging within and surrounding sites wherever feasible.</u> The retention and planting of native species hedging within and surrounding sites will also be encouraged as a method to enhance biodiversity and background wildlife capacity. The LPA will not support proposals for close board fencing where hedgerows between properties and at the boundaries of sites would be appropriate. Such hedgerows should use wildlife friendly, and where appropriate, native plant species"
Anna Corser	V.6	At last this is being taken more seriously! Please be guided by Warwickshire Wildlife.	Noted.	None.
Welford-on-Avon Parish Council	V.6	A programme of tree-planting in all types of developments – or in consultation with parish councils to find suitable locations to mitigate loss of biodiversity. Developers (householders and commercial) must ensure no tree is cut down unless necessary and unless this has been mitigated and compensated elsewhere in the development or offsite through official carbon offsetting scheme. Therefore, we ask that all new developments should demonstrate if applicable, a zero net tree loss.	The SPD encourages tree planting within all new developments and states that existing trees should be retained on site where possible. It is considered that each development must be considered on an individual basis and whilst the removal of existing trees is discouraged, requiring mitigation and compensation for tree loss would go beyond the requirements of the Core Strategy and would be something to consider in the Core Strategy Review.	Amend wording to paragraph 5 of V.6.2: "Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so.</u> As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25

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			<p>However, this section notes that the Environment Bill proposes to make provision for biodiversity net gain a condition of planning permissions in England. It is expected that this will be adopted as national policy later this year. Additional wording will be added to the SPD make it clear that Major and Minor developments are expected to demonstrate biodiversity net gain where possible, in line with the adopted Core Strategy and current practice.</p> <p>An additional paragraph will also be added to state that trees should be incorporated into street frontages, as this can have multiple benefits and reflects the requirements of the adopted Core Strategy (Policy CS.2) and Part M of the Development Requirements SPD. This will also be added as a credit on the Checklists for Minor and Major developments.</p>	<p>dwelling per ha.; Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.</p> <p>Add new paragraph 6 to Section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p>

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				<p>Amend second sentence of first paragraph of V.6:</p> <p>“Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England.”</p> <p>Amend wording to first paragraph of Section V.6.1.:</p> <p>“Opportunities to enhance biodiversity are available across all scales of development. <u>Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not possible. Warwickshire County Council Ecological Services have produced a Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, ‘offsetting’ will be sought in line with the Warwickshire County Council biodiversity offsetting programme.</u>”</p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>“It should be noted that the Environment Bill proposes to make biodiversity net gain a condition of all development proposals with the exception of</u></p>

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				<p>householder developments and some Brownfield sites. It expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</p> <p>Add new information box to p. 25, Section V.6.1:</p> <p>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements , part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</p>
Bidford-on-Avon Parish Council - Clerk	V.6	The Parish Council fully supports this. By maintaining biodiversity, flood risk is mitigated whilst wildlife and nature is protected. It will also result in better and healthier lives for the local community of the district.	Support is noted.	None.
Shipston-on-Stour Town Council	V.6	There may be long term conflicts between the tree roots and building foundations. The encouragement to plant at junctions will have road safety implications if the species are not controlled/maintained and obscure visibility splays.	<p>Warwickshire County Council Highways will be consulted during any application that has the potential to affect highways. Any potential issues that may arise as a result of proposed planting will be assessed at the planning application stage by the LPA to ensure that the proposed planting of any trees does not conflict with building foundations.</p> <p>Additional wording will be added to the SPD to clarify that any planting will need to be considered carefully</p>	<p>Additional wording to be added to paragraph 2 of Section V.6.3:</p> <p>"The creation of local wildlife nodes, utilising underused land such as verges at block junctions and street corners for wildlife friendly planting and wildlife habitats will be encouraged in new and existing developments. <u>Proposed planting must appropriately maintain highway safety, such as keeping clear important pedestrian and vehicle visibility splays, and avoid long term conflicts with building foundations.</u>"</p>

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			with respect to road junctions and building foundations.	
Facilities Integration Ltd	V.6	Some guidance of what species are considered native to the District would be useful.	The wording will be amended to refer to Part N of the SPD and the Warwickshire Landscape Guidelines, which provides details of plant species native to different areas of the District.	Amend paragraph 2 of section V.6.1: "In order to enhance and mitigate against the loss of existing biodiversity, development proposals will be expected to provide wildlife friendly planting and landscaping within proposed green infrastructure. A variety of native species should be used to enhance local biodiversity. <u>For details of species of plants native to different areas of the district, please refer to Part N (Biodiversity and Green Infrastructure) of this SPD and Warwickshire Landscape Guidelines"</u>
Stephen Norris	V.6	This section should include strong protections for existing trees and hedgerows. It should set requirement for 20% tree cover in green spaces in the wider site, and that more than 50% of the wider site should be green space.	<p>Wording will be amended to p. 25 to make clear that existing veteran trees and trees of high public amenity value should be retained in site layouts.</p> <p>Wording will be amended to p. 26 to state that development should retain native species hedging wherever feasible.</p> <p>An additional paragraph will also be added to state that trees should be incorporated into street frontages, as this can have multiple benefits and reflects the requirements of the adopted Core Strategy (Policy CS.2) and Part M of the Development Requirements SPD.</p>	<p>Amend wording to paragraph 5 of section V.6.2:</p> <p><u>"Trees should be incorporated into all major developments and also into minor developments where feasible. Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.). Tree planting should take account of the considerations detailed in Section V5 to maximise</u></p>

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			<p>The SPD already states that major developments should aspire for less than 50% of the wider site (excluding buildings) to consist of paved areas/hard standing, and it is considered that this is a realistic standard for developments to aspire to. It is considered that setting a requirement for percentage of tree cover would be difficult to implement as it is dependent on site constraints and may potentially conflict with Landscape Character guidelines and therefore, is not considered appropriate to require in the SPD.</p>	<p>cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p> <p>Amend wording to page 26:</p>

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				<p><u>“Development proposals should retain native species hedging within and surrounding sites wherever feasible. The retention and planting of native species hedging within and surrounding sites will also be encouraged as a method to enhance biodiversity and background wildlife capacity. The LPA will not support proposals for close board fencing where hedgerows between properties and at the boundaries of sites would be appropriate. Such hedgerows should use wildlife friendly, and where appropriate, native plant species”</u></p>
St Joseph Homes Limited	V.6	Support Principle 5’s ambition to promote biodiversity on new developments and recognise important of protecting and enhancing biodiversity on sites.	Support is noted.	None.
Environment Agency - Sustainable Places	V.6	<p>Welcome this Principle. Recommend further emphasis on blue-green corridors as they provide multiple benefits to areas including services such as flood management provision, green space, cooling local temperatures, ecological function and amenity. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure. Consequently they need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This can be also incorporated into surface water</p>	<p>Further wording will be added to encourage the provision of blue-green corridors in new developments.</p> <p>It is considered that requiring all developments to create space for water would be infeasible as not all developments will have sufficient space for this and it would not always be reasonable to expect applicants to do this – for example, in small householder developments.</p>	<p>Amend wording to first paragraph of V.6.3 as follows:</p> <p>“Local Wildlife Nodes and <u>Blue/Green Corridors</u></p> <p><u>Green/blue corridors are strips of green and/or blue infrastructure which link green/blue spaces in developments to the surrounding biodiversity network,</u> enabling the bridging of habitats where they have been separated by human development. The provision of these will be encouraged in all major developments, and also in minor developments where appropriate. They can be either land or water corridors, and can be designed to incorporate walking and cycling routes, thereby reducing reliance on the car by</p>

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		management of the site. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.		<p>promoting active travel, as well as enhancing biodiversity and encouraging wildlife in the area. <u>Blue/green infrastructure can have multiple benefits, including flood management provision, the encouragement of biodiversity and the lowering of local temperatures.</u></p> <p>Insert new paragraph 3 to section V.6.3:</p> <p><u>“Development near watercourses, such as blue corridors, will be expected to provide easements in accordance with the criteria set out in Section V.6.3.”</u></p>
Waterways Association	V.6	Supports this section.	Support is noted.	None.
Di Brennan	V.6	<p>Amongst the 3 sections there was no mention of not building a major construction across 4 valuable wildlife corridors, or not constructing a huge bridge which will endanger the flight of Stratford’s swan population.</p> <p>No mention of protecting existing wildlife corridors. Recognised wildlife corridors should not be built across/intersected.</p>	The SWRR is outside of the scope of the SPD as it is a strategic infrastructure project. The SPD can only expand on and provide guidance to existing planning policy contained in our Core Strategy, so it could not regulate the location of strategic development. These will be issues to consider in the forthcoming Core Strategy review, which is anticipated to commence later this year.	None.
V.6.1 Bio-Enhancing Existing Green				
Warwickshire Wildlife Trust	V.6.1	A crucial point which has not been referenced is the maintenance and enhancement of connectivity in the landscape. Development should maintain existing linear features such as hedgerows and respect corridors like rivers in the landscape by leaving a buffer to enable people and wildlife to move freely in response to climate	Additional wording will be added to noted that green infrastructure and measures to enhance biodiversity should be consider holistically, to ensure connectivity.	Insert new wording to Introduction of Section V.6, beneath first paragraph: <u>“All measures to implement green infrastructure and enhance biodiversity should be undertaken holistically, ensuring that connectivity is maintained and enhanced. Development should maintain existing linear features such as hedgerows and respect existing</u>

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		change. Maintaining connectivity is crucial to ensuring the local populations are resilient. The impact of improving a site for wildlife is magnified when the site is connected to other species rich areas or wildlife corridors.		<u>blue/green corridors such as rivers in the landscape by leaving a buffer to enable people and wildlife to move freely in response to climate change. Maintaining and improving connectivity is crucial to ensuring the local populations are resilient. The impact of improving a site for wildlife is magnified when the site is connected to other species rich areas or wildlife corridors."</u>
St Joseph Homes Limited	V.6.1	Support ambitions of this section. We are committed to creating a net biodiversity gain and support providing habitat enhancements.	Support is noted.	None.
Waterways Association	V.6.1	Supports this section	Support is noted.	None.
Delta Planning	V.6.1	The section outlines need to minimise impacts and provide biodiversity net gains. However it seems the incorporation of such measures is encouraged rather than a necessity and little weight can be applied to the Council's biodiversity net gain approach. However, there is an intention to introduce national biodiversity net gain requirements. The Stratford net gain criteria should fall in line with emerging national policy, noting that brownfield sites and small sites might be excluded due to viability issues. It is important that Local Authorities have regard to net gain requirements when preparing development plans, as housing allocation numbers will have to be reduced in order to compensate for a reduction in developable areas due to land being set aside for biodiversity	<p>This section notes that the Environment Bill proposes to make provision for biodiversity net gain a condition of most planning permissions in England. It is expected that this will be adopted as national policy later this year. Additional wording will be added to the SPD make it clear that Major and Minor developments will be expected to demonstrate biodiversity net gain unless otherwise agreed, in line with the adopted Core Strategy.</p> <p>Regarding including biodiversity net gain as a point on the development checklists, as biodiversity net gain will likely become compulsory within the near future, it is considered that this would become obsolete shortly</p>	<p>Amend second sentence of first paragraph of section V.6:</p> <p>"Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England."</p> <p>Amend wording to first paragraph of Section V.6.1.:</p> <p>"Opportunities to enhance biodiversity are available across all scales of development. <u>Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not possible. Warwickshire County Council Ecological Services have produced a</u></p>

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		net gain purposed. It is unfortunate that the checklists provided as part of this SPD do not allow points to be scored where an overall net gain to biodiversity can be achieved.	after the SPD is due to be adopted and therefore would not accord with the checklists aims of encouraging measures above and beyond existing statutory requirements.	<p><u>Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, 'offsetting' will be sought in line with the Warwickshire County Council biodiversity offsetting programme."</u></p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>"It should be noted that the Environment Bill proposes to make biodiversity net gain a condition of all development proposals with the exception of householder developments and some Brownfield sites. It expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</u></p> <p>Add new information box to p. 25, Section V.6.1:</p> <p><u>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements , part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</u></p>
Canal and River Trust	V.6.1	Despite the sub-heading the text does not appear to encourage enhancement of existing green infrastructure. The bio-enhancement	Additional wording will be added to noted that green infrastructure and measures to enhance biodiversity (including existing green	Insert new wording to Introduction of Section V.6, beneath first paragraph: " <u>All measures to implement green infrastructure and enhance biodiversity</u>

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		of existing GI (e.g. a canal corridor) where it is adjacent to a development site should be encouraged.	infrastructure) should be consider holistically, to ensure connectivity.	<u>should be undertaken holistically, ensuring that connectivity is maintained and enhanced. Development should maintain existing linear features such as hedgerows and respect corridors such as rivers in the landscape by leaving a buffer to enable people and wildlife to move freely in response to climate change. Maintaining and improving connectivity is crucial to ensuring the local populations are resilient. The impact of improving a site for wildlife is magnified when the site is connected to other species rich areas or wildlife corridors."</u>
V.6.2 Improving Background Wildlife Capacity				
Cllr Nigel Rock	V.6.2	Draws attention to excessive lighting which has greatest effect in rural areas. Over lighting has adverse effects on wildlife, ecological balance, dark skies, neighbour nuisance and highway safety as well as energy. Problem include high energy external flood lights and external security lighting illuminated for daytime and dusk till dawn. Insufficient use is currently made of planning conditions to prevent continuous use of external lighting both at night and in daylight. Such conditions should be applied unless there is reason not to do so. Such conditions should restrict lit areas to those needed to be lit and impose light level limits on the advice of the Institution of Lighting Engineers. Suggested householder guidance may be useful. For instance:	<p>Additional wording will be added to encourage applicants to reduce the level of external lighting where possible.</p> <p>It should be noted that the SPD can only provide guidance to existing planning policy and cannot create new policy. Street lighting is usually a matter for Warwickshire County Council Highways and would not be a matter the District Council could control via planning policy. However, it is proposed for additional wording to be added to Section V.6.2 to discourage the use of excessive external lighting.</p> <p>The Council is committed to tackling climate change and your comments will also be passed onto the Council's Climate Change Panel.</p>	<p>Insert additional paragraph 3 to Section V.6.2:</p> <p><u>"External lighting can negatively affect wildlife, as well as wasting energy. Applicants will be encouraged to assess as to whether developments could take place without external lighting or whether it can be designed and located to be less intrusive and/or regulated, such as timed to switch off late at night, to minimize its impact on nocturnal species."</u></p>

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		<p>“Internal lighting is a deterrent where it makes a home look occupied, for instance on a time or darkness sensor. External security lights can be useful if a potential offender feels that might be observed. Responsive lighting is always preferred to continuous lighting both for security effectiveness, energy and nuisance avoidance. Care is needed as external lights can be a statutory nuisance if they illuminate neighbouring houses or affect drivers on the road. No direct lighting of other properties or of sky should occur”</p>		
IM Land	V.6.2	<p>Whilst IM supports the provision of new trees as part of measures to enhance site biodiversity and site landscaping there is no evidence provided to support the guidelines proposed, nor is any information provided on what is expected for non-residential development. It is recommended that additional information is provided and the guidelines are tested to ensure they are achievable in both new residential and non-residential development.</p>	<p>Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging the provision of trees within new developments and street frontages, and protecting existing veteran trees and trees of public amenity value.</p>	<p>Amend wording to Paragraph 5 of section V.6.2:</p> <p>“Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so.</u> As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.). Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as</p>

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				<p>the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p>
St Modwen Developments	V.6.2	Whilst St Modwen supports the provision of new trees as part of measures to enhance site biodiversity and site landscaping there is no evidence provided to support the	Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging	Amend wording to Paragraph 5 of Section V.6.2: “Trees should be incorporated into all major developments and also into minor

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		<p>guidelines proposed, nor is any information provided on what is expected for non-residential development. It is recommended that additional information is provided and the guidelines are tested to ensure they are achievable in both new residential and non-residential development.</p>	<p>the provision of trees within new developments and protecting existing trees on site.</p>	<p>developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.).</u> Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD."</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>"Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas."</u></p> <p>Delete following credit from Checklists:</p>

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				<p>"Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)"</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>"Trees incorporated into primary street frontages"</u></p>
Facilities Integration Ltd	V.6.2	<p>More repetition rather than back referencing, which would make more sense in reducing document length and coordinating guidance.</p> <p>No clear indication of what is mandatory and what is not. You could insist on use of dissipative paving on all surfaces other than main and feeder routes.</p> <p>Para 5 – mandatory or nice to have?</p> <p>P25 Para 1 – how are you going to 'encourage'</p>	<p>It is considered that back-referencing can be cumbersome and confusing to understand, and it is not considered that this section is overly wordy or repetitive so as to become difficult to read.</p> <p>The SPD Principle Sections are to be read in conjunction with the Development Checklists, which make clear how many measures different types of development should achieve and which of these measures are mandatory. The only measures that are mandatory are electric vehicle charging points and renewable energy sources, and these will only be mandatory for new build minor and major developments. The remaining measures included in the SPD are encouraged but applicants will be able to choose from those detailed in the SPD to meet the checklist requirements.</p>	None.

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John Stott	V.6.2	Tree numbers required are very low per dwelling.	Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging the provision of trees within new developments and protecting existing trees on site.	<p>Amend wording to Paragraph 5 of Section V.6.2:</p> <p><u>“Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so.</u> As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.). Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.”</u></p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle</u></p>

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				<p><u>collision where near to vehicle routes and parking areas."</u></p> <p>Delete following credit from Checklists:</p> <p><u>"Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)"</u></p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>"Trees incorporated into primary street frontages"</u></p>
Warwickshire Wildlife Trust	V.6.2	<p>Title of this section is a little odd. The value of existing habitat should have stronger emphasis. A veteran tree (older than 400 years) or existing species rich hedge row is incomparable to their replacement by replanting and landscaping. These key features should be the foundations which the biodiversity of the site is built from if development occurs. The Habitat Biodiversity Audit and Local Wildlife Site data is key to understanding and improving the background wildlife capacity as it informs what should not be destroyed and what should be recreated through mitigation.</p>	<p>The wording will be amended to state that existing native species hedgerows and important trees should be retained.</p> <p>Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging the provision of trees within new developments and protecting existing trees on site.</p> <p>An additional paragraph will also be added to state that trees should be incorporated into street frontages, as this can have multiple benefits and reflects the requirements of the adopted Core Strategy (Policy</p>	<p>Amend wording to paragraph 6, Section V.6.2 (p.26)</p> <p><u>"Development proposals should retain native species hedging within and surrounding sites. The retention and planting of native species hedging within and surrounding sites will also be encouraged as a method to enhance biodiversity and background wildlife capacity. The LPA will not support proposals for close board fencing where hedgerows between properties and at the boundaries of sites would be appropriate. Such hedgerows should use wildlife friendly, and where appropriate, native plant species"</u></p> <p>Amend wording to paragraph 5 of Section V.6.2:</p>

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			CS.2) and Part M of the Development Requirements SPD.	<p>“Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts.</u> The removal of protected trees will be resisted unless there are <u>overriding planning reasons for doing so.</u> As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.). Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to Section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p>

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				<p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p>
St Joseph Homes Limited	V.6.2	<p>Acknowledge that new development should aim to minimise the amount of hardstanding found on site. However, consider acknowledgement should be made for brownfield sites which are mostly if not completely covered in hardstanding.</p> <p>The aspiration for hedgerows being provided in place of closeboard fencing does not reflect commercial realities of delivering residential sites. Partitions between neighbouring properties must be in place from first occupation, and hedgerows can take many years to develop. The SPD should also promote other wildlife friendly measures which can be utilised, such as hedgehog holes.</p>	<p>It is considered that the wording as written provides sufficient flexibility for those developments which cannot achieve less than 50% hard standing, as it is not a mandatory requirement for all development but one of the options applicants can choose to meet the 15 checklists measures required.</p> <p>It is noted that the implementation of hedging will not always be appropriate, therefore, revised wording is proposed to reflect this and encourage the use of hedgehog holes where close board fencing is proposed. However, existing guidance for close board fencing contained within Part D (Buildings and Layout) of the Development Requirements SPD must still be adhered to within proposed developments, and</p>	<p>Amend wording to sentence 2 of paragraph 6 of V.6.2 as follows:</p> <p><u>“The LPA will not support proposals for close board fencing to the side and rear of properties where these would be visible in the public realm or adjacent to the countryside, in accordance with Part D of the adopted Development Requirements Supplementary Planning Document. In all other cases, the LPA will discourage the use of close board fencing where hedgerows between properties and at the boundaries of sites would be appropriate. Such hedgerows should use wildlife friendly, and native plant species. <u>Where close board fencing is proposed, such fencing should include ‘hedgehog holes’ so as to allow connectivity for wildlife.”</u></u></p> <p>Amend wording of paragraph 2 of V.6.2:</p>

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			additional wording will be added to note this.	<p>“Wildlife habitat enhancements such as bird/bat nesting boxes, hibernacula (places for animals to hibernate), amphibian kerbs, <u>hedgehog holes in fencing</u> and hedgehog homes should be incorporated within all new developments wherever appropriate.”</p> <p>Amend checklist item as follows:</p> <p>“At least one of the following: bird/bat boxes/ amphibian kerbs/ hibernacula/<u>hedgehog holes</u>/ hedgehog homes/garden ponds.”</p>
Waterways Association	V.6.2	Supports this section.	Support is noted.	None.
Delta Planning	V.6.2	<p>“Wildlife habitat enhancements... should be incorporated within all new developments wherever appropriate.” We support this, although query how some of these features can be retained and maintained after developments become occupied. For example, how can you be confident that a hedgehog home is retained and kept in good condition in a reasonably accessible location, once the land becomes privately owned?</p> <p>“In major developments, proposals should aspire for less than 50% to consists of hardsurfaced area” This goes beyond requirements of Part M and N of the SPD and is an aspiration not backed by policy.</p>	<p>It is not possible to ensure that every measure will be retained in perpetuity once developments become privately owned; however, it is intended that by encouraging developments to include these habitat enhancements, a substantial proportion will be retained and this will provide improvements to biodiversity in the long term.</p> <p>Regarding the guidance on percentage of hardsurfacing, this part (Part V) of the Development Requirements SPD does not conflict with Part M of the SPD but provides additional guidance to Core Strategy CS.6 (Natural Environment) and CS.7 (Green Infrastructure). It should be noted that this is included as an</p>	<p>Amend wording to paragraph 5 of Section V.6.2:</p> <p>“Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.)</u>. Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as</p>

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		<p>“Trees should be incorporated into all major developments... guidelines for tree planting ...”</p> <p>This goes beyond requirements of Part M of SPD. However, it does make clear this is only a guideline and the checklist does allow for credits to be scored which is welcomed.</p> <p>Hedgerows instead of close board fencing – while aesthetically more pleasing, hedgerow alone does not offer same level of security and privacy benefits as standardised fencing or brick walls. Hedging will take some time to establish, requires proper management and maintenance and is often needed in addition to close board fencing where it marks private property boundaries.</p>	<p>aspiration for major developments and is not compulsory; therefore, it does not conflict with existing policy.</p> <p>Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging the provision of trees within new developments and protecting existing trees on site.</p> <p>An additional paragraph will also be added to state that trees should be incorporated into street frontages, as this can have multiple benefits and reflects the requirements of the adopted Core Strategy (Policy CS.2) and Part M of the Development Requirements SPD.</p> <p>It is noted that the implementation of hedging will not always be appropriate, therefore, revised wording is proposed to reflect this and encourage the use of hedgehog holes where close board fencing is proposed. However, existing guidance for close board fencing contained within Part D (Buildings and Layout) of the Development Requirements SPD must still be adhered to within proposed developments, and additional wording will be added to note this.</p>	<p>the guidelines provided within Part M of this SPD.”</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p> <p>“Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)”</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>“Trees incorporated into primary street frontages”</u></p> <p>Amend wording to paragraph 6 of V.6.2 as follows:</p>

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				<p>“The LPA will not support proposals for close board fencing <u>to the side and rear of properties where these would be visible in the public realm or adjacent to the countryside, in accordance with Part D of the adopted Development Requirements Supplementary Planning Document. In all other cases, the LPA will discourage the use of close board fencing where hedgerows between properties and at the boundaries of sites would be appropriate. Such hedgerows should use wildlife friendly, and native plant species. <u>Where close board fencing is proposed, such fencing should include ‘hedgehog holes’ so as to allow connectivity for wildlife.</u>”</u></p> <p>Amend wording of paragraph 2 of V.6.2:</p> <p>“Wildlife habitat enhancements such as bird/bat nesting boxes, hibernacula (places for animals to hibernate), amphibian kerbs, <u>hedgehog holes in fencing</u> and hedgehog homes should be incorporated within all new developments wherever appropriate.”</p> <p>Amend checklist item as follows:</p> <p>“At least one of the following: bird/bat boxes/ amphibian kerbs/ hibernacula/<u>hedgehog holes</u>/ hedgehog homes/garden ponds.”</p>
Gladman Developments	V.6.2	50% of site to be paved/hard surfacing – Gladman are pleased to note that the Council have sought to include some flexibility within the wording of this paragraph and	It is proposed to retain the wording that major developments should aspire for less than 50% of the site (excluding buildings) to be paved/hard surfacing. It is	Amend wording to paragraph 5 of Section V.6.2: “Trees should be incorporated into all major developments and also into minor

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		<p>consider there will be circumstances where major development will by nature include areas where more than 50% of the site is made up of paved/hard surfaces. As such we suggest that the Council continue to recognise this in the SPD and build upon the flexibility established, ensuring they do not seek to include related restrictions that would prevent otherwise sustainable development opportunities coming forward.</p> <p>Incorporation of trees into all major developments – Gladman are concerned that it is not recognised that there will be instances where it is not possible or even safe to meet the guidelines. Therefore suggest sufficient flexibility is established in wording so as not to impose unsuitable requirements on development proposals.</p>	<p>considered that the wording already contains sufficient flexibility so as not to discourage otherwise sustainable development from coming forward, whilst encouraging developments to meet this target wherever possible.</p> <p>Regarding the requirement for trees, it is proposed to amend the wording to reflect the requirement for flexibility and site specific circumstances, whilst encouraging the provision of trees within new developments and protecting existing trees on site. An additional paragraph will also be added to state that trees should be incorporated into street frontages, as this can have multiple benefits and reflects the requirements of the adopted Core Strategy (Policy CS.2) and Part M of the Development Requirements SPD.</p>	<p>developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.)</u>. Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.</p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>“Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas.”</u></p> <p>Delete following credit from Checklists:</p>

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				<p>"Plan for 10 large native trees per ha in high density areas (over 40 dwellings per ha.), increasing to 25 in medium density areas (25-40 dwellings per ha.) and 50 in low density areas (less than 25 dwellings per ha.)"</p> <p>Add following credit into Checklist for Minor/Major developments:</p> <p><u>"Trees incorporated into primary street frontages"</u></p>
Miranda Forrester	V.6.2	SDC should be aware of the fact that street lighting can have a detrimental effect on wildlife. If a development has loads of lighting the effect will be bad for wildlife. It is essential that lighting is turned off at night.	<p>It should be noted that the SPD can only provide guidance to existing planning policy and cannot create new policy. Street lighting is usually a matter for Warwickshire County Council Highways and would not be a matter the District Council could control via planning policy. However, it is proposed for additional wording to be added to Section V.6.2 to discourage the use of excessive external lighting.</p> <p>The Council is committed to tackling climate change and your comments will also be passed onto the Council's Climate Change Panel.</p>	<p>Insert additional paragraph 3 to Section V.6.2:</p> <p><u>"External lighting can negatively affect wildlife, as well as wasting energy. Applicants will be encouraged to assess as to whether developments could take place without external lighting or whether it can be designed and located to be less intrusive and/or regulated, such as timed to switch off late at night, to minimize its impact on nocturnal species."</u></p>

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V.6.3 Local Wildlife Nodes and Green Corridors				
St Joseph Homes Limited	V.6.3	Support the ambition of this section and recognise importance of local wildlife nodes and green corridors. Appropriate and significant landscaping has a significant role to play in the provision of such nodes and corridors.	Support is noted.	None.
Waterways Association	V.6.3	Supports this section.	Support is noted.	None.
Warwickshire County Council - Flood Risk	V.6.3	The FRM team supports this and would highlight that providing easements of 6-8m adjacent to watercourses – minimum of 8m adjacent to a main river – is not only for maintenance but to ensure the bank and channel can remain as natural as possible. De-culverting of watercourses, as has been undertaken at Meon Vale, increases biodiversity value of watercourses.	In accordance with Environment Agency advice, additional wording will be added to state that 8m easements should be included to watercourses.	Insert new paragraph 3 to Section V.6.3: <u>“Development near watercourses, such as blue corridors, will be expected to provide easements in accordance with the criteria set out in Section V.6.3.”</u>
Irene Beaver	V.6.3	SDC need to bring in a local by-law to prevent householders and land owners mowing grass verges so we have nothing more than a pristine lawn which does nothing for the environment. Urbanistes who buy farmland mow grass verges strimming biodiversity so small mammals and insects can't survive. Hedges are often replaced by walls or fences and porous surfaces covered in hard landscaping. A massive campaign to explain to SDC residents that the grass verges belong to everyone and mowing them without permission is not allowed and illegal.	It should be noted that the SPD can only expand upon existing planning policy guidance and cannot introduce new policy or bylaws. However, the SPD does encourage the planting of junctions and verges, where appropriate. The Council is committed to tackling climate change and your comments will be passed onto the Council's Climate Change Panel.	None

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Canal & River Trust	V.6.3	The canal corridor can provide a range of habitats and is an excellent existing connecting corridor for wildlife to link up to other areas of green space. Developments near the canal should connect their green corridors to the waterway. We support the encouragement to connect new green infrastructure to existing GI corridors.	Additional wording is proposed to the introductory section of Section V.6 to state that proposals for green infrastructure and biodiversity enhancements should be undertaken holistically and ensure connectivity is maintained and enhanced.	Insert new wording to Introduction of Section V.6, beneath first paragraph: " <u>All measures to implement green infrastructure and enhance biodiversity should be undertaken holistically, ensuring that connectivity is maintained and enhanced. Development should maintain existing linear features such as hedgerows where possible and respect existing blue/green corridors such as rivers in the landscape by leaving a buffer to enable people and wildlife to move freely in response to climate change. Maintaining and improving connectivity is crucial to ensuring the local populations are resilient. The impact of improving a site for wildlife is magnified when the site is connected to other species rich areas or wildlife corridors.</u> "
Miranda Forrester	V.6.3	All verges should be mown once in summer and then cuttings taken away. Regularly mowing verges is a waste of energy and money.	<p>It should be noted that the SPD can only expand upon existing planning policy guidance and cannot require things that are outside the remit of planning. However, the SPD does encourage the planting of junctions and verges, where appropriate.</p> <p>It should be noted that the SPD can only expand upon existing planning policy guidance and cannot introduce new policy or bylaws. However, the SPD does encourage the planting of junctions and verges, where appropriate. The Council is committed to tackling climate change and the comments</p>	None.

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			will be passed onto the Council's Climate Change Panel.	
Tom Smerdon	V.6.3	<p>There are no places in the District to give people the chance to pay for their carbon footprint by planting trees. What are SDC doing to ensure farmers start planting trees on the tremendous amounts of farming land in the district? Due to the climate crisis there is now a moral responsibility to start planting trees and rewild the District but this will involve private land. How do you intend to incentivise and legislate that landowners should have a carbon sink responsibility? Clearly those with land have the responsibility Perhaps a scheme where citizens can mass plant to share some of the burden would be appropriate. What are you doing to make these plans a reality?</p>	<p>The SPD can only provide guidance to existing planning policy, as within our adopted Core Strategy. As such, it cannot create new policies or include requirements that fall outside the remit of planning. The SPD also encourages tree planting and states that existing trees should be retained in site layouts. However, additional wording will be added to clarify that development proposals will be expected to achieve a biodiversity net gain, which will assist in adapting to and mitigating the impacts of climate change.</p> <p>The Council is due to commence a review of its Core Strategy later in 2020 and carbon offsetting through tree planting within the District will be considered as part of this review.</p>	<p>Amend second sentence of first paragraph of V.6:</p> <p>"Additionally, The Environment Bill, announced in October 2019, proposes to make provision for biodiversity net gain a condition of <u>most</u> planning permissions in England."</p> <p>Amend wording to first paragraph of Section V.6.1.:</p> <p><u>"Opportunities to enhance biodiversity are available across all scales of development. Working with Warwickshire County Council, Major and Minor scale development proposals will be expected to secure a net gain in biodiversity, unless exceptional circumstances satisfactorily demonstrate that this is not possible. Warwickshire County Council Ecological Services have produced a Biodiversity Impact Assessment (BIA) calculation, based on the Defra metric, to measure the biodiversity impact of Minor and Major development proposals. Where a development will have a negative impact on a biodiversity asset, 'offsetting' will be sought in line with the Warwickshire County Council biodiversity offsetting programme."</u></p> <p>Add new paragraph 2 to Section V.6.2:</p> <p><u>"It should be noted that the Environment Bill proposes to make biodiversity net</u></p>

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				<p>gain a condition of all development proposals with the exception of householder developments and some Brownfield sites. It expected that this Bill will mandate the use of the Defra metric when calculating biodiversity impact in developments.</p> <p>Add new information box to p. 25, Section V.6.1:</p> <p>"For more information, please see https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements , part N (Biodiversity and Green Infrastructure) of this SPD and https://www.warwickshire.gov.uk/biodiversityoffsetting".</p>
V.7. Case Studies				
The Inland Waterways Association (Warwickshire Branch)	V.7	The Respondent considers that the Case Studies section is a well-thought out and presented piece of work	Support Noted	None.
Facilities Integration Ltd	V.7	The Respondent considers that the case studies are laudable but indicative of what has been done and, admittedly in not cases, where we should be. There is no indication of what is LZC or zero carbon. There are no examples of zero carbon retrofits or an indication of what one is.	Agree that information on retrofitting would be beneficial to incorporate into the SPD.	Add new section V2 (Retrofitting into existing buildings) within the SPD.
Stratford Town Council Climate Change	V.7	The Respondent considers that there are some good examples of environmental initiatives in the case studies.	Support Noted.	None.

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Emergency Panel				
V.8. Climate Change Checklist				
Facilities Integration Ltd	V.8	The respondent considers that the checklists are written in planning jargon.	Comments noted, however the items on the checklist link to more detailed information within the main section of the SPD which explain what the different measures mean. Checklists 3 relating to householder developments has deliberately been written to enable home owners to be able to understand the terminology. Checklists 1 and 2 are more relevant to applicants and developers more familiar with planning related terminology and as such is considered appropriate	None.
The Inland Waterways Association (Warwickshire Branch)	V.8	The Respondent is pleased to support this addition to the area planning policy.	Support Noted.	None.
Anna Corser	V.8	The Respondent considers that the use of the checklists is a good idea and that all new builds, conversions and extensions are an opportunity to use alternative energy so feels that this should be mandatory in all 3 categories.	Whilst the use of renewable energy is encouraged in conversions and extensions, due to the potential issues involved in incorporating this infrastructure into existing buildings and for extensions to existing buildings it is not considered appropriate to make this a mandatory requirement as it may not be possible in all circumstances.	None.
Facilities Integration Ltd	V.8	The Respondent notes that paragraph 3 on page 32 refers to certain applications being required to submit	Page 32 sets out which types and sizes of development are required to submit a checklist.	None.

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		<p>the checklist but does not qualify what is not applicable.</p> <p>The respondent queries whether Appendix 1 refers to non-doms.</p> <p>The Respondent applauds the use of 'must' for the checklists, not borne out in the document otherwise, however suggests that it would be best to buy into the BRE global BREEAM scheme entirely and just insist on a minimum of very Good or Excellent.</p> <p>The Respondent questions how the Council is going to police that the developments do incorporate the measures required. Insistence on use of the Council's Building Control as the follow-up as an extension of their building regulation responsibilities with enforced payment rather than third parties reliant on a client payment and thus not truly third party would be best.</p>	<p>Appendix 1 applies to all new build development over 20 square metres regardless of the use. Accept that there is merit in clarifying this in the SPD.</p> <p>Core Strategy Policy CS.2 (Climate Change and Sustainable Construction) identifies that all non-residential development should be compliant with BREEAM 'Good' standard and this is referenced in the SPD on page 15. It is acknowledged that there is some correlation between the measures set out in the SPD and BREEAM.</p> <p>The measures to be incorporated within an individual development will be secured of any planning permission including through the use of planning conditions or planning obligations. The Council's legal and enforcement teams would be responsible for enforcing any breaches.</p>	<p>Add an additional sentence to the end of the fourth paragraph on Page 32 as follows: <u>"The checklists in Appendices 1 and 2 apply to both residential and non-residential development, while the checklist in Appendix 3 relates to residential householder developments."</u></p> <p>Add additional sentence to the end of section V.8 (Climate Change Checklist) as follows: <u>"The Council's planning enforcement and legal services teams are responsible for ensuring compliance with planning conditions and obligations."</u></p>
A Jonathan Horsfield	V.8	<p>The Respondent considers that the checklists are a very good innovation but the wording could be improved to make it more effective as follows:</p> <ul style="list-style-type: none"> • Replace 'appropriate' with 'better' in second paragraph 	Agree with proposed amendments	<p>In Section V8 (Climate Change Checklist) amend the text as follows: -Second paragraph: "It is the aim of the District Council to work with developers to maximise the opportunities for climate change</p>

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		<ul style="list-style-type: none"> Insert 'very' between 'as a' and 'minimum' 		<p>mitigation and adaptation and the purpose of the checklist is to help developers consider the potential measures possible and thus encourage appropriate <u>better</u> design solutions."</p> <p>-Sixth paragraph: "As a <u>very</u> minimum proposals must incorporate at least one suitable mitigation and adaptation measure from each of the 5 principle areas:"</p>
John Stott	V.8	<p>The Respondent suggests the following additional wording in the first bullet point of the fifth paragraph after the words renewable energy: 'at a scale that substantially reduces the buildings dependence on imported energy.'</p> <p>In relation to the second bullet point of paragraph 5 the Respondent suggests that higher standards should be requested. The present demand is about 20% of available options, 33% is a better but not too onerous challenge so this would require 25, 10 and 8 measures from the respective appendices lists.</p>	<p>Agree.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p>	<p>Amend the first bullet point of the fifth paragraph to read: "For non-householder new build developments over 20 square metres, at least 15 measures in total must be provided of which one measure will be the incorporation of renewable energy <u>at a scale that substantially reduces the building's dependence on imported energy</u>, unless it is satisfactorily justified to be not possible."</p> <p>None.</p>
IM Land	V.8	The Respondent welcomes the use of a checklist to help guide development	Support Noted.	

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		<p>to ensure it considers measures to mitigate and adapt to climate change.</p> <p>The Respondent considers that additional information is required to enable best use of checklist 1 with regards to New Build Developments. There are two mandatory requirements noted for the use of renewable energy and the provision of EV charging points. While information is provided in the main document on EV charge point requirements there is insufficient information on how the requirement on renewable energy should be met. There is no target specified, or allowance for fabric and energy efficiency measures to contribute to the reduction of carbon emissions.</p> <p>In this context the Respondent recommends an additional section is provided in Section V.8 to set out details of the mandatory requirements (with supporting evidence) to enable applicants to respond.</p> <p>In addition the results of the Future Homes Standards are likely to lead to significant changes to both residential and non-residential development which is not considered.</p>	<p>Noted. The checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p> <p>The SPD is based on current national and local requirements. Neither the specification nor timescales for introduction of the Future Homes Standard is currently known and as such it is not appropriate for the SPD to try to pre-empt such changes. The SPD will be reviewed as required when changes to national requirements occur.</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p>

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Napton on the Hill Parish Council	V.8	<p>The Respondent notes that applications must adhere to 5/10/15 measures within the template and queries whether applications put forward for consultation summarise how the application performs against these measures (level of compliance).</p> <p>The Respondent also queries whether the levels of 5/10/15 have been validated by checking against a number of recent applications which are considered as best practice.</p> <p>The Respondent wishes to see strong encouragement for owners/designers/builders of new</p>	<p>As set out within paragraph 3 of section V8, applicants will be required to submit checklists with their planning application and thus be available for viewing as part of any consultation. Planning officers will consider their level of compliance as part of the overall consideration of the planning application.</p> <p>As the SPD aims to increase the number of adaptation and mitigation measures that are embedded into new developments, using existing developments as a benchmark was not considered appropriate. Rather, the levels have been based on a balanced judgement of ensuring compliance with Core Strategy policies and what level of delivery can bring about meaningful change. The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>Paragraph 6 of Section V8 confirms that the requirements of the SPD are minimum requirements. Agree</p>	<p>None.</p> <p>Add the following wording to the first sentence of paragraph 6 of section V8:</p>

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		<p>residential developments to go beyond the measures set in order to speed up meaningful change eg Code for Sustainable homes / Passivhaus etc.</p> <p>The Respondent would like to see the document future proofed by building in either rolling reviews or a review date set in 3-5 years maximum to ensure it reflects new technologies and remains fit for purpose.</p>	<p>that this could be made more explicit.</p> <p>The Council is due to commence a review of the Core Strategy in 2020, within which climate change and environmental matters will be a key consideration. This in itself will trigger a need to review the SPD.</p>	<p><u>"The Council encourages applicants to maximise the number of measures incorporated into a development in order to address the problems of climate change. As a minimum proposals must incorporate at least one suitable mitigation and adaptation measure from each of the 5 principle areas:"</u></p> <p>None.</p>
Stratford Town Council Climate Change Emergency Panel	V.8	The Respondent considers that the checklist approach is very sensible and provides a good prompt for developers to consider environmental matters in their decision making process.	Support Noted.	None.
Stephen Norrie	V.8	<p>The respondent considers that although the checklist is a good idea there are some issues with the details:</p> <ul style="list-style-type: none"> • It ranks measures as optional, and as such, as omissible, provided something else is being done. This undermines the insistence on those particular measures which the body of the SPD asserts 'must' be present. Surely they should not be part of an optional checklist • The optional nature of the checklist might allow some 	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>A key objective of the SPD is to ensure that it is easy to apply and understand by all those involved in the development process, it is</p>	None.

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		<p>items on it, if interpreted weakly, to be introduced at very low cost, in place of more expensive options. For example if rainwater collection is interpreted as meaning water butts this is a very low cost option. Arguably every new house (with a garden) should have a water butt as a matter of course. Other matters include 'plot and block orientation', 'window positioning', 'private outdoor space' (is that a garden?) etc.</p> <ul style="list-style-type: none"> The Respondent notes the value of the requirement that non-householder developments over 20m² must include renewable energy. <p>As a result of the above concerns the Respondent suggests a three-grade checklist, with some measures necessary unless for strong reason (water butts, cycle storage, passive cooling) and the rest divided between lower-grade and higher grade options, with requirements for e.g. 1 higher grade measure for every 4 lower grade measures.</p>	<p>considered that introducing additional categories would make the SPD overly complex to apply.</p>	
St Modwen Developments	V.8	<p>The Respondent welcomes the use of a checklist to help guide development to ensure it considers measures to mitigate and adapt to climate change.</p> <p>The Respondent considers that additional information is required to</p>	Support Noted.	None.

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		<p>enable best use of the checklist with regards to 'new build developments'. There is insufficient information in the SPD on how the mandatory requirement on renewable energy should be met. There is no target specified, or allowance for fabric and energy efficiency measures to contribute to the reduction of carbon emissions. The respondent recommends an additional section is added to set out details of the mandatory requirements (with supporting evidence) to enable applicants to respond.</p> <p>The results of the Future Homes Standard are likely to lead to significant changes to both residential and non-residential development which is not considered.</p> <p>There are a number of measures listed in the checklist where insufficient information is provided for an applicant to understand what is required of development, including:</p> <ul style="list-style-type: none"> • V.2.2. – Appropriate block sizes to location • V2.2 – Maximising the number of internal pedestrian routes through the site, and 	<p>Noted. The checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p> <p>The SPD is based on current national and local requirements. Neither the specification nor timescales for introduction of the Future Homes Standard is currently known and as such it is not appropriate for the SPD to try to pre-empt such changes. The SPD will be reviewed as required when changes to national requirements occur.</p> <p>Agree that additional reference within the text on all of the checklist items would provide additional clarity and guidance</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p> <p>Add the following text and checklist amendments to the SPD:</p> <p>v.2.2 – Add the following text at the start of the first paragraph: <u>"Built form defines a pattern of streets and development blocks. These should be appropriate to the location enabling</u></p>

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		<p>maximising the number of pedestrian external routes in and out of the site linking to the wider area</p> <ul style="list-style-type: none"> • V.2.3. – easy access to a range of transport modes – the Institution of Highways and Transportation provides guidance on access to public transport and services and amenities and it is recommended that this, or similar, it utilised as guidance recognising that larger sites often have the ability to provide strong public transport links. • V.3.1. – Plot and block orientation to maximise solar gain, and window positioning to maximise solar gain – UKCP18 climate projections note the potential for increasing annual temperature and therefore design needs to balance solar gain with the potential for overheating. It is recommended these requirements are removed or re-drafted to include reference to overheating • V.3.2. – Solar/low energy internal and external lighting • V.3.3 – Composting and Community composting <p>The Respondent therefore recommends that as part of the main body of the report a short summary is</p>		<p><u>people to easily move both within and into and out of the site.”</u></p> <p>v.2.3 – In the 3rd sentence of the first paragraph add the following text after ‘site’: <u>“This includes maximising the number of internal pedestrian routes through the site as well as maximising the number of external routes into and out of the site.”</u></p> <p>At the start of the first paragraph add the following sentence: <u>“All modes of transport should be positively designed in the built form. A well designed and connected network will ensure that people are given the maximum choice as to how they travel including by rail, bus, other public transport, walking and cycling.”</u></p> <p>New paragraph after the first paragraph to read: <u>“New homes should receive guidance/information booklets providing information on a range of measures such as sustainable travel options, composting initiatives, renewable energy options and contact details of organisations who can provide advice and guidance.</u></p> <p>v.2.4 – New paragraph to be added at the start of the section to read: <u>“Cycle routes should be directed to routes that are free from motorised traffic. Where this is not possible and cycle routes are provided and there is a higher volume and speed of motor traffic these</u></p>

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		<p>provided in table form under each objective, setting out a summary of the measures expected. This will allow applicants to understand what is expected for each measure.</p>		<p><u>should be well designed segregated spaces to accommodate all cycle traffic. Cycle infrastructure should provide connections that link origins and key destinations, provide direct routes and give priority to cyclists at junctions.</u>"</p> <p>Add new paragraph 4 to read:</p> <p><u>"Shower facilities should be considered and integrated into non-residential developments to facilitate commuting by cycle."</u></p> <p>v.5.2 – Delete the 'rainwater collection' entry and amend the 'communal rainwater collection and reuse points' to read: <u>"Private, and communal where appropriate, Communal</u> rainwater collection and reuse points"</p> <p>Amend the second paragraph under V.5.2 to read: <u>"Rainwater collection facilities such as communal rainwater tanks and water butts should be installed in all residential developments and householder developments where appropriate."</u></p> <p>In relation to Pocket Parks add the following text to section V.6.3:</p> <p><u>"Pocket parks are small areas of public green space which involve the reuse of areas of land for community benefit. They can be both natural and more formal in</u></p>

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				<p><u>character, and provide a green open space that also offers habitat opportunities to enhance biodiversity and a way for people to connect with nature. Developments which propose the creation of appropriately managed pocket parks will be encouraged."</u></p>
<p>Public Health Warwickshire - Communities Group</p>	<p>V.8</p>	<p>The Respondent is pleased to see the inclusion of the checklist.</p> <p>The Respondent queries how the minimum requirement for at least one measure from each of the 5 principle areas as the Respondent has concerns that this could lead to the bare minimum being provided.</p> <p>The Respondent queries whether the checklist requirements will be reviewed and how often the SPD will be reviewed as a whole.</p>	<p>Support Noted.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>The use of the checklists enables the measures incorporated into new developments to be easily monitored and reviewed as and when the need arises.</p> <p>The Council is due to commence a review of the Core Strategy in 2020, within which climate change and environmental matters will be a key consideration. This in itself will trigger a need to review the SPD.</p>	<p>None.</p>
<p>Appendix 1 – Checklist for new build</p>				

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A Jonathan Horsfield	Appendix 1	<p>The Respondent considers that Appendix 1 V.2.3 needs to include provision of bike shelters / covered lockable racks at lit bus stops to really encourage use throughout the year.</p> <p>The Respondent considers that V.5.2 should state after 'rainwater collection' add in 'distribution and use.</p> <p>The Respondent suggests the inclusion of 'hedgehog highways between gardens' in V.6.2.</p>	<p>Bus shelters and lockable covered cycle racks are beyond the scope of this document, however reference is made to developer contributions for facilities specific to developments in the SPD.</p> <p>Agree.</p> <p>Agree.</p>	<p>In V.5.2 after rainwater collection add "<u>distribution and use.</u>"</p> <p>Add a new sentence at the end of section V.6.2 as follows:</p> <p><u>"Where close board fencing is proposed, such fencing should include 'hedgehog holes' so as to allow connectivity for wildlife."</u></p> <p>Add 'hedgehog holes' to the checklist at the fourth entry in v.6.2 (Background Wildlife Capacity).</p>
St Joseph Homes Limited	Appendix 1	<p>The Respondent notes the 'required' next to renewable energy sources, however this requirement is not set out anywhere in the main text. The respondent requests that this aspect is no longer mandated as the sustainability credentials of the development should be considered holistically.</p> <p>The Respondent considers that whilst the checklist provides a very useful tool to developers to explore the climate change options available to them, care must be taken to ensure that developments are considered</p>	<p>Noted. The checklist will be amended to ensure that renewable technologies are an option but not mandatory. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.</p> <p>Agree.</p>	<p>Amend SPD and delete 'mandatory' from the checklist.</p> <p>Add new paragraph to Section V8 (Climate Change Checklist) to read:</p> <p><u>"A holistic approach should be taken to the incorporation of measures into developments to ensure that they are</u></p>

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		<p>holistically and an over reliance on one aspect may undermine the key objectives of the site and result in unreasonable weight being afforded in the planning balance.</p> <p>The requirement for inclusion of an explicit number of trees is too prescriptive, and decisions must be taken on balance and planning decisions must be made on a site by site basis.</p>	<p>Agree that more flexibility should be included within this section of the SPD.</p>	<p><u>considered as a whole and not in isolation. This will ensure that the benefits can be maximised and will reduce the need for future retrofitting."</u></p> <p>Amend wording to paragraph 5 of Section V.6.2:</p> <p><u>"Trees should be incorporated into all major developments and also into minor developments where feasible. <u>Veteran trees and trees which are of high public amenity value should be retained within site layouts. The removal of protected trees will be resisted unless there are overriding planning reasons for doing so. As a guideline, 10 large native trees per hectare should be included in high density developments (over 40 dwellings per ha.), increasing to 25 per hectare in medium density developments (25-40 dwellings per ha.) and 50 per hectare in low density developments (under 25 dwellings per ha.).</u> Tree planting should take account of the considerations detailed in Section V5 to maximise cooling benefits to buildings, as well as the guidelines provided within Part M of this SPD.</u></p> <p>Add new paragraph 6 to section V.6.2:</p> <p><u>"Incorporating trees into street frontages has multiple benefits, including reducing local temperatures, improving air quality, enhancing biodiversity and improving wellbeing of residents. Major</u></p>

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				<p><u>developments will be expected to include trees in all primary street frontages. Trees should also be incorporated into the street frontages of minor developments where possible. Trees should be provided with suitable protection from vehicle collision where near to vehicle routes and parking areas."</u></p>
Louise Appleton	Appendix 1	<p>The Respondent considers that the Council should be more ambitious. The checklists should ask for more than the 15, 10 and 5 measures in appendices 1, 2, and 3.</p> <p>For new builds, developers should have to agree to more than 15 measures out of 55 and suggests it should be 20.</p> <p>The 'other' box also leaves the measures a little ambiguous. If the planning department is making the decision that the 'other' is acceptable, who is policing the planning department to ensure that these measures are truly 'green' and will impact upon mitigating climate change.</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p> <p>The provision of the 'other' category is to allow for innovative and emerging technological solutions to be incorporated to enable some flexibility and future proofing of the guidance. Decisions on the suitability of 'other' measures put forward will be taken based on the extent to which they meet the principles for climate change adaptation and mitigation as set out in the SPD. No change proposed.</p>	None
Facilities Integration Ltd	Appendix 1	The premise of insistence is sound but the individual items need to be reviewed for ease of understanding.	There are separate checklists for new build, change of use/conversion and householder developments and it is considered	None.

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		<p>The items do not co-ordinate with the text in the document in strength of expectation and wording</p> <p>The Respondent queries whether this is applicable to non-dom buildings and suggests separate checklists for use classes – one for domestic and one for non-domestic – with possibly a third for industrial. Alternatively the Respondent suggests deferring to BREAAAM standards.</p> <p>V.v.2. 800m in 10 minutes is 1.33m/s. The Respondent suggests that this precludes women over 50 and men over their mid-60s and questions whether with an ageing population this is realistic.</p>	<p>that this is sufficiently clear within the SPD. It is considered that in order to maintain simplicity it would not be appropriate to have further checklists for different use classes and in any event the range of measures set out within the checklists could apply to a wide variety of uses. The merit of providing developers flexibility in selecting measures on a case by case basis allows suitable measures to be provided accordingly. No change proposed.</p> <p>Whilst it is acknowledged that there will always be exceptions, 800m is an accepted average 10 minute walk standard for development design purposes.</p>	
Bourne Leisure Limited	Appendix 1	<p>The Respondent considers that the measures set out within the appendix provide little recognition of any existing mitigation and adaptation measures that may have been implemented on-site by a householder, developer or business operator already.</p> <p>The Respondent notes that there is no justification within the SPD as to why at least one measure from each of the principles is required. In the absence of this, the SPD should allow more</p>	<p>The Appendix includes categories for 'other' measures that the applicant can list other measures that it intends to incorporate into the development.</p> <p>If deemed acceptable to the Local Planning Authority these 'other' measures can count towards the requirements for adaptation and mitigation.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use</p>	None.

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		flexibility regarding the precise number of measures to be achieved, recognising that the appropriate standard should be determined on a case by case basis and in a way that is proportionate to the scale and nature of individual development proposals. This is particularly important in the context of listed buildings, for which the SPD already acknowledges there is a compatibility issue with regard to the application of these standards.	of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites. Section V8 acknowledges that proposals affecting Listed Buildings may not be able to comply and in these case officer discretion will be used as to what is feasible on a case-by-case basis.	
David Passingham	Appendix 1	The Respondent considers that the checklist criteria of 15/10/5 measures are very weak. This is a small proportion of the suggested measures in the checklist. Each of the measures on the checklists are important for energy efficiency or ecology otherwise they would not have been included. All of the measures listed are achievable, most are not expensive, and all would be desirable for most residents. As we have a climate emergency all the measures should be carried out if at all possible. If a developer is unable to complete a measure they should give a good reason.	The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.	None.
Peter Chaddock	Appendix 1	The Respondent would like to see a mandatory requirement for integrated renewable energy sources of appropriate capacity i.e. that the PV array and solar thermal panels are of a size capable of meeting x% (ideally x=110) of the projected household's energy needs, not by bolting on a	Noted. The purpose of the SPD is to provide more detailed information on existing Core Strategy policies. However, as part of the forthcoming Core Strategy review the policies will be reviewed particularly in relation to renewable energy.	No further action.

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		<p>couple of 'token' panels and claiming a tick in that box. If we are serious about becoming carbon neutral by 2030 then the dwellings we allow to be built from now on must aim to make tangible contributions to meeting that challenge. There should be no possible permutations of the 15 selected measures which enable developers to get away with a meaningless box-ticking pseudo-ecogreen-wash tokenised design combination.</p>		
Appendix 2 – Checklist for change of use and conversions				
Bourne Leisure Limited	Appendix 2	<p>The Respondent considers that the measures set out within the appendix provide little recognition of any existing mitigation and adaptation measures that may have been implemented on-site by a householder, developer or business operator already.</p> <p>The Respondent notes that there is no justification within the SPD as to why at least one measure from each of the principles is required. In the absence of this, the SPD should allow more flexibility regarding the precise number of measures to be achieved, recognising that the appropriate standard should be determined on a case by case basis and in a way that is proportionate to the scale and nature of individual development</p>	<p>The Appendix includes categories for 'other' measures that the applicant can list other measures that it intends to incorporate into the development.</p> <p>If deemed acceptable to the Local Planning Authority these 'other' measures can count towards the requirements for adaptation and mitigation.</p> <p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites. Section V8</p>	None.

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		proposals. This is particularly important in the context of listed buildings, for which the SPD already acknowledges there is a compatibility issue with regard to the application of these standards.	acknowledges that proposals affecting Listed Buildings may not be able to comply and in these case officer discretion will be used as to what is feasible on a case-by-case basis.	
David Passingham	Appendix 2	The Respondent considers that the checklist criteria of 15/10/5 measures are very weak. This is a small proportion of the suggested measures in the checklist. Each of the measures on the checklists are important for energy efficiency or ecology otherwise they would not have been included. All of the measures listed are achievable, most are not expensive, and all would be desirable for most residents. As we have a climate emergency all the measures should be carried out if at all possible. If a developer is unable to complete a measure they should give a good reason.	The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.	None.
Louise Appleton	Appendix 2	The Respondent considers that the Council should be more ambitious. The checklists should ask for more than the 15, 10 and 5 measures in appendices 1, 2, and 3.	The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.	None.
Canal and River Trust	Appendix 2	The Respondent notes that change of use applications come in many forms and thus recommend that the	Comments Noted. It is considered that the range of measures within Checklist 2 is sufficiently varied to	None.

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		<p>appendix is reviewed to ensure that with the variety of such applications there is a reasonable prospect that it will be possible for all proposals to comply with 10 measures. If this is not the case some caveat needs to be included, such as that which is proposed in relation to listed buildings.</p>	<p>allow for a minimum of 10 measures to be incorporated into any given proposal. An 'other' category is included to enable applicants to propose suitable alternative measures. No change proposed.</p> <p>Section V8 acknowledges that proposals affecting Listed Buildings may not be able to comply and in these case officer discretion will be used as to what is feasible on a case-by-case basis.</p>	
Appendix 3 – Checklist for householders				
David Passingham	Appendix 3	<p>The Respondent considers that the checklist criteria of 15/10/5 measures are very weak. This is a small proportion of the suggested measures in the checklist. Each of the measures on the checklists are important for energy efficiency or ecology otherwise they would not have been included. All of the measures listed are achievable, most are not expensive, and all would be desirable for most residents. As we have a climate emergency all the measures should be carried out if at all possible. If a developer is unable to complete a measure they should give a good reason.</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.</p>	None.
Louise Appleton	Appendix 3	<p>The Respondent considers that the Council should be more ambitious. The checklists should ask for more than the 15, 10 and 5 measures in appendices 1, 2, and 3.</p>	<p>The role of the SPD is to provide additional guidance and interpretation of existing Core Strategy policies, and as such the quantity of measures and the use of the checklist is considered</p>	None.

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			appropriate based on existing policies. It is important to maintain the flexibility in the SPD to enable developers to have options about which measures they choose for specific sites.	
Appendix 4 – Glossary				
Councillor Nigel Rock	Appendix 4	<p>The Respondent considers that Council planners are quite prescriptive and resistive about what is meant by a green wall, indicating that these must be of a type equivalent to some proprietary systems. The Respondent prefers the definition proposed in the SPD Glossary but with the second sentence amended as follows:</p> <p>“Installations might be supported on a framework, and might include drainage and irrigation systems, they work to...”</p> <p>The reason for this is that not all species, locations, heights etc will require support, drainage or irrigation, for instance low green walls, or climbing varieties. There is an existing SPD on green walls and care should be taken to ensure that the SPDs do not overlap or conflict.</p>	Agree to proposed amended wording to the glossary entry for green walls.	Amend the second sentence of the glossary entry for green walls as follows: <u>“Installations might be supported on a framework, and might include drainage and irrigation systems, supported by an irrigation and drainage system. They work to reduce air pollution and to increase biodiversity.”</u>
John Hale	Appendix 4	<p>The Respondent requests an additional entry in the glossary for ‘sustainable energy (and development)’:</p> <p>“Sustainable energy/development should meet the needs of the present without compromising the ability of</p>	Agree to proposed addition to the glossary of sustainable development.	Add additional entry to the glossary for <u>“Sustainable Development’ as follows: “Sustainable development should meet the needs of the present without compromising the ability of future generations meeting their own needs.”</u>

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		<p>future generations to meet their own needs.”</p> <p>The Respondent notes that planting a tree to capture 1 tonne of CO2e over its 100 year life is not sustainable for a project emitting 1 tonne over a 25 year life, even if the land is available now as it compromises future choice.</p>		
Warwickshire County Council Flood Risk	Appendix 4	<p>The Respondent recommends a number of alterations to the glossary to give them consistency in line with the SDC Strategic Flood Risk Assessment and the Suds manual CIRIA C753.</p> <ul style="list-style-type: none"> • Attenuation could be changed to the following, the use of the word lakes gives the impression only lakes can attenuate however all SUDs features can provide attenuation: “Attenuation is the process of slowing and storing water and then discharging it at a specified maximum rate to a suitable outfall, this is often achieved through the use of Sustainable Drainage Systems.” • Soakaways come in many different forms and rubble is often discouraged due to potential detriment to water quality if clean uncontaminated material is not used. 	Agree with proposed glossary amendments.	<p>Amend the definition of ‘Attenuation’ in the Appendix 4 Glossary to read:</p> <p>“Attenuation, in the context of lakes and rainwater, is the collection and storage of water after a heavy rain period. Lakes can mitigate flooding by collecting the water after storms and then releasing it slowly over a period of time. They minimise the risk of flash floods. Attenuation is the process of slowing and storing water and then discharging it at a specified maximum rate to a suitable outfall, this is often achieved through the use of Sustainable Drainage Systems.”</p> <p>Amend the definition of ‘Soakaways’ in the Appendix 4 Glossary to read:</p> <p>“A hole in the ground that has been filled with rubble which A drainage feature that collects and allows water to seep down. It is an efficient way to deal with surface water in a way that has very little environmental impact.”</p>

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		<p>Soakaways could be changed to: "A drainage feature that collects and allows water to seep through it. It is an efficient way to deal with surface water in a way that has little environmental impact."</p> <ul style="list-style-type: none"> • Sustainable Drainage Systems could be changed to the following from the SUDs manual: "The Suds approach involves slowing down and reducing the quantity of surface water run off from a developed area to manage flood risk downstream, and reduce the risk of runoff causing pollution this is achieved by harvesting, infiltrating, slowing, storing, conveying and treating runoff on site. SuDs allow water to become a more visible and tangible part of the built environment, which can be enjoyed by everyone." 		<p>Amend the definition of 'Sustainable Urban Drainage System (SuDS)' in the Appendix 4 Glossary to read:</p> <p>"Seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run off into the ground, promote the filtration and evaporation of water as close to the source as possible and break down pollutants and, where appropriate, recycle grey water within the development. Designed to minimise the impact of development on the natural water environment, they are an alternative to drainage through pipes directly to a water course and help enhance water quality and biodiversity, maintain groundwater levels and reduce the risk of flooding. The SuDS approach involves slowing down and reducing the quantity of surface water run off from a developed area to manage flood risk downstream, and reduce the risk of runoff causing pollution. This is achieved by harvesting, infiltrating, slowing, storing, conveying and treating runoff on site. SuDs allow water to become a more visible and tangible part of the built environment, which can be enjoyed by everyone."</p> <p><u>"Seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run off into the ground, promote the filtration and evaporation of water as close to the source as possible and break down pollutants and, where appropriate, recycle grey water within the development. Designed to minimise the impact of development on the natural water environment, they are an alternative to drainage through pipes directly to a water course and help enhance water quality and biodiversity, maintain groundwater levels and reduce the risk of flooding. The SuDS approach involves slowing down and reducing the quantity of surface water run off from a developed area to manage flood risk downstream, and reduce the risk of runoff causing pollution. This is achieved by harvesting, infiltrating, slowing, storing, conveying and treating runoff on site. SuDs allow water to become a more visible and tangible part of the built environment, which can be enjoyed by everyone."</u></p>