

SUMMARY OF RESPONSES RECEIVED FROM THE CONSULTATION ON THE SUSTAINABLE DEVELOPMENT AND CONSTRUCTION SUPPLEMENTARY PLANNING DOCUMENT (8th JULY – 19th AUGUST 2005)

ORGANISATION	SUMMARY OF COMMENTS	RECOMMENDED ACTION TAKEN
<p>Environment Agency Downsedge Residents Association Shalford Conservation Society</p>	<p>The document should cover, in the Water Section (formally Section 4 now Section 6), flood risk, flood risk assessment, surface water run off and the need for new development not to increase flood risk else where</p>	<p>The link between SuDS and reducing surface run off and flooding has been made clearer and reference has been made to when a flood risk assessment, in line with the Surrey Structure Plan Policy SE3, should be undertaken by re-wording Solution 20 (now Solution 24) from 'The use of SuDS will be encouraged as an alternative land drainage system (see appendix 3 for examples).'</p> <p>to 'Flooding caused by excessive run off should be mitigated by the use of Sustainable Drainage Systems (SuDS), where appropriates, as an alternative land drainage system. (See appendix 3 for examples). A flood risk assessment should be submitted with any proposal within a high-risk area and for new residential development in areas of low to medium risk (the Environment Agency will provide indicative maps). Any development should not worsen run off and flood risk elsewhere.'</p>
<p>Environment Agency Vail Williams incorporating Robert Shaw planning Highways Agency</p>	<p>The checklist should have a question with wording along the lines of 'has a flood risk assessment been carried out for the development'</p> <p>The checklist is to simplistic and should give applicants a chance to expand on the 'yes' or 'no' answers, especially if they have ticked 'no' to a number of questions</p> <p>Include public transport in Para 1.14 of the checklist</p>	<p>A question referring to flood risk assessment has been included. The checklist has been updated to reflect the new Sustainability Solutions added to the document.</p> <p>The checklist now provides a section to enable developers to expand on their checklist answers if they wish to. The checklist also has a section for applicants to briefly describe the scheme and its size.</p>

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Environment Agency Thames Water Three Valleys Water Cllr Fiona White	Add an additional Sustainability Solution in the Water Section (formally Section 4 now Section 6) regarding water efficiency to cover low/dual water flush toilets, spray taps and showers, efficient domestic appliances, low water use gardens, and rain water recycling and collection. This is due to the fact that The Water Act 2003 places a duty on water companies and local authorities to promote water conservation.	Sustainability Solution 21 (now Solution 25) has been re written to incorporate water efficiency measures it has changed from, 'The Borough Council will encourage the provision of rainwater collection systems (e.g. water butts)' to 'Water is one of our most precious natural resources; Guildford Borough Council is keen to ensure it is used wisely. Therefore water efficiency measures, such as efficient devices and appliances, should be part of any development. The use of rain water harvesting and the recycling of water will also be encouraged (for further information see Para 5.7 in Appendix 5)' Additional information on water efficiency has been added to Appendix 5 (Para 5.7), information supplied by Thames Water has been used.
Environment Agency	More emphasis should be given to air quality in The Built Form Section (Formally Section 2 now Section 4), and the document should mention that a Health Impact Assessment should be undertaken when a development could adversely affect air quality.	The Building Regulations and Environmental Health Legislation adequately deal with air quality, therefore no change is proposed.
Worplesdon Parish Council Guildford Society Ash Parish Council Vail Williams incorporating Robert Shaw planning Weymount Neighbourhood Group	Stated that they support the document	Support welcomed

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Shere Parish Council		
Worplesdon Parish Council Fairland's, Liddington Hall, and Gravett's Lane Community Association	A potential inconsistency was high lightened in that in this document the Borough Council promotes the siting of allotments close to residential areas but have also identified the Westborough Allotments as a development site	The Westborough Allotment is a site identified in the Local Plan for housing and open space. The release of this site does not set a precedent for the release of other allotments or on the aspiration to integrate new allotments in major developments. No Change.
Worplesdon Parish Council Fairland's, Liddington Hall, and Gravett's Lane Community Association	The use of Willow trees should be avoided as the roots are very destructive	Willow trees are recommended as they are a particularly fast growing species that could potentially be used as fuel in a biomass or CHP scheme. As long as the trees are planted away form structures where the roots could cause damage then they are acceptable. No change.
Guildford Society	The planning system may not have jurisdiction to require many of the elements within the document	Comment noted. The document makes it clear that it supplements and expands on current policy. The document has only referred to issues where there is planning policy guidance. The wording has been phrased to make it clear when something can be required and when it should be undertaken as good practice. No change.
Guildford Society Raymond Smith, Downsedge Residents Association	Clarification is needed on what would happen if a poor scoring sustainability checklist were submitted, and what the overall aims and objectives of the Sustainability Checklist are. Clarification is need on the difference between the checklist and statement.	The introduction has been re written (Now Section 1 - Introduction and Context, re written paragraphs are 1.1 – 1.8) making it clear that the checklist is a tool to help DC Officers identify what Sustainability Solutions have been included in a proposal, and negotiate their inclusion if they are missing but achievable, and that DC Officers will therefore not score the application. It has been made clear that GBC will expect but not require the checklist, and that it is better, and good practice, to achieve a BREEAM rating or complete the SEEDA checklist in preference to completing the GBC checklist. A Sustainability Solution promoting BRREAM and the SEEDA checklist has been added to the Built Form Section (Solution 6) and will read
Vail Williams incorporating	Promoting BREEAM 'Excellent' conflicts with the building regulations and could	'Sustainability should be considered at the earliest stage of a proposal. It is recommended that the SEEDA Sustainability Checklist is completed and/or BREEAM or Ecohomes accreditation is sought

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<p>Robert Shaw planning RPS Planning on behalf of Fairview New Homes Ltd Guildford Environment Forum</p>	<p>affect the financial viability of a site. It would be better to get developers to get the highest BREEAM standard they can achieve.</p> <p>The expectation of meeting Ecohomes 'Excellent' is too high especially for small developments of five units, and it is unrealistic to expect the highest level of sustainability to be met straight away. The process of developing sustainability criteria should be phased. It also goes beyond that recommended in the SE Plan which states 'Very Good' should be sought.</p> <p>Giving developers a choice between the GBC yes/no checklist or BREEAM rating is counterproductive as applicants will choose the former, which is easy to complete and has no value</p>	<p>to test the impact of each building. Applicants should aim to achieve 'Very Good', or above, BREEAM and Ecohomes standard or meet the 'Good Practice', or above, score in the SEEDA Checklist'</p> <p>The promotion of 'Excellent' rating has been changed to 'Very Good' because GBC should promote a 'Very Good' rating to begin with as this is the level referred to in the South East Plan. The recommended level can be raised to 'Excellent' in time, if this is considered appropriate. A case study referring to the Normandy Ecohomes has been inserted after Solution 6. More information has been added to the appendix on the Built Form (now Appendix 3) To reduce confusion, all references to 'Guildford's Sustainability Statement' will be changed to a 'Guildford's Sustainability Checklist'</p>
<p>Guildford Society</p>	<p>It will be hard for GBC to 'ensure' that development is highly accessible by means other than the private car in Solution 3.</p>	<p>This solution has been re written to make it clear that reducing the need and distance travelled by private cars is the aim of GBC by locating development close to transport nodes, Solution 3 will be amended from</p> <p>'The Borough Council will influence the need to travel by ensuring that new development is highly accessible by means other than the private car (see Section 5 Movement)'. to 'Reducing the distance and need to travel by private car should be incorporated into new development by locating houses, commercial units, schools and other development close to local infrastructure and highly accessible, sustainable, transport nodes such as bicycle lanes, bus stops, train stations and walking routes (see Section 5 Movement).'</p>

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Guildford Society	GBC should require the checklist to be submitted at outline stage so that sustainability can be design in at the earliest stage	It has been made clear in the introduction that GBC will also expect a checklist at outline stage for those applications meeting the criteria (see paragraph 1.8). This is because sustainability should be designed in at the earliest stage
Guildford Society	GBC will be unable to enforce the re-use of materials and the use of sustainably sourced materials	GBC can enforce this through planning conditions, as appropriate. No change..
Guildford Society	The conservation of character should come before the use of alternative energy, as the use of solar panels etc will be inappropriate in certain areas.	If a listed building or conservation area were to be affected then planning permission is likely to be required, so alternative energy will not impact on the character of such areas, as inappropriate development will be refused. No Change.
Guildford Society	Developments will be unable to meet all elements of the checklist	It is not stated that developments do have to meet all elements of the checklist. No change.
Guildford Society	Include secure cycle storage in the list in Solution 25 (now Solution 30).	The Solution now contains a reference to promoting travel by sustainable means, such as secure cycle storage and has been changed from 'The Borough Council will encourage larger developments to provide additional facilities that would reduce the need to travel such as crèches, gyms, canteens, small shops and shower facilities' to 'Major developments should provide additional facilities that would reduce the need to travel or promote travel by sustainable means, such as secure cycle storage, charging facilities for electric vehicles, crèches, gyms, canteens, small shops and shower facilities
Cllr Fiona White	More information on designing out crime	This is already covered in the Residential Design Guide and Surrey Design Guide and therefore it is not considered necessary to repeat in this document. No change..
Cllr Fiona White	More information on (Green) Travel Plans	After clarification with the Travel Plan Co-ordinator at SCC, more information has been added to the corresponding Appendix on Movement (Appendix 6 – Para 6.5) regarding the workings of Travel Plans (formally Green Travel Plans) and who is responsible for monitoring and enforcing them.
Raymond Smith	GBC is not being bold enough. The	The existing threshold will allow both officers and developers to familiarise themselves with the

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<p>(GEF) Horsley Countryside Preservation Society Shere Parish Council Downsedge Residents Association Effingham Parish Council</p> <p>Alliance Environment and Planning Ltd on behalf of Lacey Simmons Ltd and Premier Properties Ltd RPS Planning on behalf of Fairview New Homes Ltd</p>	<p>threshold of five units should be lower as the cost of completing the checklist would be covered by the increase in site value. The threshold is also impractical, as some issues will affect single units.</p> <p>The threshold for completion of the checklist is too low and will seriously affect the viability of residential development, particularly smaller schemes.</p>	<p>Sustainability Checklist and sustainability issues as a whole. The document will state that the SPD is relevant to all applications and all applications should consider it (Para 1.4), however the checklist will be expected for all applications meeting or exceeding the threshold. The threshold was set in consultation with Development Control officers. It is considered unrealistic to request the SPD be applied to all developments, which may result in major resource implications or delays in the determination of applications.</p>
<p>Raymond Smith (GEF) Shere Parish Council</p>	<p>Solution 17 in the Energy Section (now Solution 19) should be amended to read 'External lighting (e.g. floodlights) should be kept to a minimum. Where external lighting is installed, however, the Borough Council will encourage the use of solar powered or energy efficient</p>	<p>Solution 17 (now 19) will be amended from 'The Borough Council will encourage the provision of solar powered or energy efficient external lighting (e.g. floodlights)' to 'External lighting (e.g. floodlights) should be kept to a minimum. Where external lighting is installed, however, solar powered or energy efficient systems that also minimise light pollution by directing light to the ground should be used.'</p>

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Raymond Smith (GEF)	<p>systems</p> <p>In Section 7 there should be reference to road crossing facilities for wildlife.</p>	<p>light to the ground should be used.'</p> <p>Comment noted. This is a highly detailed point which does not merit its own section in this document, it has however been referred to in Sustainability Solution 39, which covers Green networks/corridors, as an example of how to assist wildlife move around a site.</p>
Guildford Environmental Forum	<p>Green networks and Corridors should be encouraged in this document.</p>	<p>Green networks/corridors were briefly referred to in Para 6.2 of Appendix 6 (now 8.2 of Appendix 8). A new Sustainability Solution has been added to Section 9 Biodiversity and Wildlife (formally Section 7 Landscape and Wildlife), it reads 'Green networks/corridors should be designed into large developments; small-scale developments should link with established corridors. Developments should include simple ways of assisting wildlife to move through, and thrive within, the development such as road crossing facilities and bird tables.'</p>
Raymond Smith (GEF)	<p>There is little incentive for developers to take up sustainability issues, the developments should be accredited by the Council if they are of a high standard</p>	<p>There are no resources available at present for GBC to accredit developments. No change.</p>
Raymond Smith (GEF)	<p>SuDS require long term management</p>	<p>This is referred to in Para 3.7 (now 5.7) of Appendix 3 (now Appendix 5). No change.</p>
TV Energy	<p>Biomass and ground source heat pumps should be given more prominence in Section 3 as Surrey is a very wooded county and SCC recently commissioned a study to examine ways of developing the local wood fuel economy</p>	<p>Biomass is defined in the Energy Appendix Para 2.2 of Appendix 2 (now 4.4 of Appendix 4). No change.</p>
GOSE	<p>The document is consistent with national and regional planning policies and clearly cross referenced to Local Plan policies and the Surrey Structure Plan</p>	<p>Support welcomed</p>

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Fairland's, Liddington Hall, and Gravett's Lane Community Association	Approve of the use of brownfield land first	Support welcomed
SEEDA	Unable to comment on the SPD as there are no available resources	Response noted
Jennie Kyte, Downsedge Residents Association Shalford Conservation Society	Buildings should have windows on as many walls as possible to allow natural ventilation. Internal rooms should have high ceilings to allow air to circulate. South facing orientation may not be sensible as it is likely that there will be a rise in summer temperatures and therefore south facing rooms and buildings will become very hot and there will be a need for air conditioning and fans that will increase energy consumption.	A new sustainability solution on how to reduce over heating, and reduce the need for air conditioning in the summer has been added to the Energy Section, Solution 18, it reads, 'Air conditioning should be avoided as it increases the consumption of energy and produces heat that is 'dumped' elsewhere. Shutters, verandas, solar shading, high ceilings, natural ventilation and other cooling systems should be used to mitigate the effects of hot weather'
Horsley Countryside Preservation Society	The Movement Section should consider transport issues in rural areas such as vehicle and speed restrictions.	These issues are out of the remit of GBC Planning, the document does, however, signpost readers to the Local Transport Plan produced by SCC in Appendix 10 –'Further Information'. No change.
Downsedge Residents Association	Split Appendix 1 so there is a separate appendix for the Built Form.	The Appendix that supported Sections 1 – The Local Context and Section 2 - The Built Form (now Sections 3 and 4) has been totally re written. The Local Context Section is now supported by Appendix 2 and directly refers to the Sustainability Solutions identified in the Local Context Section (now Section 3). A new Appendix has been written for the Built Form Section. This expands on three issues identified in the Built Form Section, locally sourced materials, flexible use and embodied energy and BREEAM ratings and the SEEDA checklist.
Downsedge	More information should be provided on	This is the remit of Building Regulations. No change.

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Residents Association	how to insure the quality of buildings internal areas of developments such as the plumbing, electrics and painting	
Downsedge Residents Association	A well insulated detached house can have many advantages and be energy efficient, this should be mentioned	Para 2.1.3 (now Para 4.2.3) now reads 'poorly insulated detached houses...' instead of 'detached houses...'
Downsedge Residents Association	There is a lot of repetition between the Built Form Section and the waste Section. Para 28 should be deleted and Para's 5.2 to 5.6 in Appendix 5 should be moved to the Built Form Section	The Built Form Section now also covers reducing building waste, such as reusing construction materials, to remove repetition between the Built Form and Waste Sections. Solution 5 (now Solution 10) now refers to embodied energy and reclaiming building materials. The Solution has been changed from 'The Borough Council will encourage design and construction, which minimises waste production through the re-use of construction and demolition materials' to 'Design and construction should minimise waste production through the re-use of construction and demolition materials to reduce the embodied energy of the development. Developers should aim to recycle all demolition materials on site to minimise vehicle movement. Materials should be removed which can be used via a reclamation business such as floorboards, doors and roof tiles. Reuse of such materials in proposed developments is encouraged.'
Downsedge Residents Association	The document does not cover some important issues that relate to sustainable development, these are insufficient affordable housing, traffic flow and congestion, parking, alcohol related anti-social behaviour, light pollution, lack of affordable recreational	These issues although highly relevant to sustainable development, are not within the remit of planning, or are covered in other documents and strategies. The document clearly signpost readers to other documents and strategies that relate to these issues such as the Parking SPD (and when it will be revised) the infrastructure SPD, Open Space SPD, River Wey Management Plan, Local Transport Plan, and affordable housing strategies. A comprehensive list has been added to Appendix 10 (Formally Appendix 8). No change.

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Downsedge Residents Association' English Heritage	<p>facilities for teenagers, and poor use of the River Wey</p> <p>Protecting Guildford's heritage is not given enough prominence in this document. There should be a sustainability solution regarding heritage in Section 1 as this is an important element of regarding where development should be located and what form it takes. The wording in Appendix 1.4 could be used. More emphasis should be put on heritage, communities, character appraisals and place making with reference to the HELM website. The section on Landscape and Wildlife makes no specific mention to landscape. It should be made clear that retaining buildings should be given preference to demolition and there should be a sustainability statement to this effect</p>	<p>A new Sustainability Solution (Solution 3) was added to the Local Context Section (formally Section 1 now Section 3) to encourage applicants to consider the character of the area when preparing their application it will read.</p> <p>'The character and context of the proposed development area, and its surroundings, should be considered and assessed to ensure the development is in keeping, complements its surroundings and is not isolated, out of scale or inappropriate (See Section 10 Heritage, Landscape and Sense of Place'</p> <p>The 'Landscape and Wildlife' Section will be renamed 'Biodiversity and Wildlife'; Landscape will be referred to in a new Section (Section 10) on Heritage, Landscape and Sense of Place. This new section will have Sustainability solutions that refer to the importance of historic features to sense of place and social cohesion, and the need to use materials that do not permanently damage the character and fabric of buildings so that future generations can benefit from the historic structures as well. There are five Solutions in this section (Solutions 40-44), they read as</p> <p>40 Conservation Areas, Listed Buildings, Scheduled Ancient monuments, archaeology and Locally Listed Buildings perform an important role in maintaining the character and sense of place of the borough, whilst providing a valuable economic resource in terms of tourism and urban regeneration. These finite resources will be rigorously protected for their own sake to enable future generations to share their benefits. Where an application could affect such a designated feature, it is recommended that early expert advice is sought from the Design and Conservation team at Guildford Borough Council and the County Archaeologist, and a site appraisal is undertaken.</p> <p>41 Materials used in new development should respect the existing context and the character of the borough. Traditional materials and application should be used to avoid permanent damage to the character or fabric of the buildings so that they are protected for future generations.</p> <p>42 Applicants should ensure that developments are within the scale, form and character of their surroundings. GBC will require a design statement to be submitted with all applications. All</p>

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		<p>residential applications should be prepared following the guidance in the Residential Design Guide, and follow the design checklist for each of the character areas defined in Part 4 avoiding any concerns identified regarding the character areas.</p> <p>43 Developments should complement both the built and natural landscape, therefore the Guildford Borough Landscape Character Assessment (due for publication in Spring 2006) and the Surrey Historic Landscape Character Assessment should be considered in the preparation of applications</p> <p>44 Where possible existing buildings should be used and adapted for new uses. Buildings should be recycled so as to ensure that land is not wasted and the cultural resource is not lost.</p> <p>The reference to the reuse of existing buildings that was in Sustainability Solution 7 (now Solution 9) has been moved from The Built Form to this new Section along with the example and photo of the Rodboro building.</p> <p>Sustainability Objective 1 has been re written to put more emphasis on issues regarding the location of development rather than protecting heritage. It has changed from ‘Development protects Guildford’s heritage and is in contexts with its surrounds, so that it integrates and interacts with established areas and is not isolated, out of scale or inappropriate’ to ‘Development that is located to use land effectively and complements its surroundings, so that it integrates and interacts with established areas and is not isolated, out of scale or inappropriate’.</p> <p>A new sustainability Objective has been written for the new Section 10, it reads, ‘Development that has minimal impact on, and protects, Guildford’s diverse heritage, archaeology and landscape for current and future generations, and provides a sense of place by complementing the established character and physical features of the borough’</p>
Paul Sanderson, SCC	SAP and NHER should be moved from Appendix 1 to appendix 2 as they are energy ratings	Agreed. These have been relocated as suggested

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Home Builders Federation	The SPD is not in line with government policy as it sets out new policy in expecting applicants to submit a sustainability checklist. The document should be held back until GBC has adopted a policy that allows this.	GBC is expecting a checklist to be submitted but is not requiring this. Therefore an application is not invalid without it. The document is considered to be compliant with government guidance.
Home Builders Federation	GBC should use a checklist that is used regionally or nationally such as the SEEDA checklist which is likely to be rolled out nation wide as a good practice example.	The SPD will retain the accompanying checklist as it will aid in monitoring the impact of developments, the implementation of the SPD and The Climate Change Strategy and assist Development Control Officers negotiations. The SPD does now also promote the SEEDA checklist (and BREEAM and Ecohomes) in Solution 6 and Para 1.6 in the Introduction and Context.
Shalford Conservation Society Guildford Environmental forum	The document should be phrased in the impersonal dropping statements such as 'Guildford Borough Council will....' The use of the words 'encourage' and 'promote' means that solutions are not positive enough and often weak.	The Sustainability Solutions have been re written to drop phrases such as 'encourage' and 'promote'. The document is setting out good practice on the back of planning policy so solutions will be re phases to say 'Applicants, developers, developments should....'. the word 'should' will be used as applicants 'should' undertake and follow the sustainability solutions to achieve good practice. Where GBC can require something this will be stated.
Shalford Conservation Society	All photos are from Guildford, a wider cross section of the Borough should be used and where a bad example is show a good example should be alongside	An example of Ecohomes in Normandy has been added to the Built Form section.
Shalford Conservation Society	Explain what a concealed household is and that the mix of size and type is subject to review	This has been explained in Paragraph 2.4 of Appendix 2 – Further Information on the Local Context.
Shalford Conservation Society Guildford Environmental	There should be a comprehensive bibliography of documents and dates and when these will be revised	The bibliography has been expanded to included more relevant document

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Forum		
Shalford Conservation Society	It should be clearer from the beginning what each of the sections cover, and the information in the appendix should be alongside the text in the main body of the document	Comment noted. No change. Each of the sections are clearly headed, signposting readers to the further information in the appendix.
Surrey Wildlife Trust	Supports the promotion of Green roofs and SuDS	Support welcomed
Surrey Wildlife Trust	Wording in Solution 30 (now Solution 35) should read ‘...to determine whether designated sites, BAP habitats and protected or Biodiversity Priority species will be affected by the proposal and if so how the applicant will avoid or mitigate this	The wording has been changed from ‘The Borough Council will encourage the submission of an ecological survey to determine that no species listed in the Surrey Biodiversity Action Plan are affected by the proposal, and if such species are threatened how the applicant will mitigate this’. To ‘An ecological survey should be undertaken to determine whether designated sites, BAP habitats and protected or Biodiversity Priority species will be affected by the proposal and if so how the applicant will avoid or mitigate this’
RPS Planning on behalf of Fairview New Homes Ltd	On site composting will only be viable for sites of 50 units+	It is considered that small composting facilities can be provided for developments smaller than 50units. No change.
RPS Planning on behalf of Fairview New Homes Ltd	10% of renewable energy on site will be at the cost of developers and affect the cost effectiveness of developments, each site should be assessed on individual merits	Comment noted. No change. Policy SE2 of the Surrey Structure Plan clearly supports the requirement that 10% of energy should be supplied by on site renewables for commercial and residential development. Applicants will be sign posted to a document on implementing Policy SE2 prepared by SCC. No change.
Guildford Environmental Forum	When referring to renewable energy systems in Solution 16 (now Solution 17), the document should not single out conservation areas or listed buildings.	Solution 16 has been merged with Solution 14, both are now Solution 17. The phrase in brackets relating to listed buildings and conservation areas has been removed. The last sentence in text in the text box supporting the images of Parson’s Green, in the Energy Section, will be removed to make this sound more positive towards solar panels.

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	<p>Design that would have a detrimental affect would not be approved in such circumstances so there is no needed for the sentence in brackets GBC should not over emphasis the protection of character over renewable energy. They can complement each other. The supporting text to the photos on page 11 gives the impression that solar panels have a negative affect.</p>	
<p>Guildford Environmental Forum</p>	<p>Solution 23 should be split into two parts as there are two separate issues. Integrating them in one solution lessens the impact of the issues.</p>	<p>Solution 23 is now split, it is now Solutions 27 and 28. It has changed from 'The Borough Council will encourage developments where pedestrians have priority over the car and are in within walking distance of established infrastructure'. to 27 'Applicants should ensure that their proposed development includes measures that provide pedestrians with priority over cars, such as raised crossing facilities, wide pavements and traffic calming measures, by consulting Surrey County Council early in the design process'. 28 'New development should be within walking distance of established infrastructure such as a park, doctor's surgery, bus stop, cycle lane, allotment and a local shop. If this is not possible, such facilities should be provided.'</p>
<p>Countryside Agency</p>	<p>Has no available resources to comment on the document</p>	<p>Response noted</p>
<p>Energy Conservation and Solar Centre (ECSC)</p>	<p>Should include the concept of embodied energy</p>	<p>Embodied energy has now been referred to in Appendix 3 – Further Information on the Built Form Para 3.2.</p>
<p>Addition changes identified out of further research and discussions with GBC Officers</p>		

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ORGANISATION	SUMMARY OF COMMENTS	RECOMMENDED ACTION TAKEN
	<p>The three Sustainability Solutions in the Waste and Recycling Section have been amended from ‘The applicant should explore the viability of providing designated recycling bins both internally and externally.’ ‘The Borough Council will encourage design and construction, which minimises waste production through the re-use of construction and demolition materials (e.g. as aggregate)’ ‘The Borough Council will encourage the provision of composting bins and internal storage areas within flatted developments for recycling purposes.’ To ‘Internal and external storage areas, designated for recycling purposes, should be integrated into a development. For commercial developments, space should be allowed for the collection and storage of bulk materials for recycling.’ ‘Communal composting bins/areas should be included in new developments to allow residents to reuse organic waste.’ ‘Flatted developments will require space for five wheeled recycling bins to enable residents to segregate their recycling into paper, cans and colour separated glass.’ The example in the Waste and Recycling Section has also been altered to include examples from Sutherland House and Wey View Court instead of Tuinham Close.</p>	
	<p>The Landscape Character Assessment has been mentioned and Sustainability Solution 31 has been re written, to include a mention of non-native invasive plant species, from ‘The Borough council will seek to retain existing planting/trees of UK natives derived from seed of local provenance in planting schemes’ to ‘Existing planting/trees should be retained. If this is not possible the plant or trees should be replaced by UK native species derived from seeds of local provenance. The planting of non native or highly invasive planets such as Japanese Knotweed, Old Mans Beard (Clematis Vitalba) and Ragwort should be avoided in developments’</p>	
	<p>A new section on Heritage, Landscape and Sense of Place has been added to promote heritage and character in the SPD</p>	
	<p>The choice offered to applicants between submitting the GBC Sustainability Checklist or achieves a BREEAM rating has been removed as it would have been likely that developers would choose the GBC Checklist over achieving a BREEAM rating, as it is easier to complete the complete the checklist. Therefore no choice is offered and BREEAM and the SEEDA checklist is strongly encouraged.</p>	
	<p>The Energy Appendix has new Sections on CHP and Energy Efficiency, Para 4.3 and 4.6.</p>	
	<p>The Introduction and Context have been merge and Appendix 7 is now Appendix 1. This is so the document flows better.</p>	
	<p>There have been minor spelling and grammatical changes.</p>	
	<p>In the ‘Relevant Policies’ boxes, the Community Plan Priorities have been moved up the list.</p>	