Sustainable Design and Construction
Supplementary Planning Document (SPD)

CONSULTATION STATEMENT
(Regulation 17(1)(b))

March 2011
If you would like this document in a different format, different language, Braille, large print or audio, please contact the Planning Policy Team on 01483 444471.
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INTRODUCTION

The Purpose of this Consultation Statement

This statement has been prepared by Guildford Borough Council in accordance with Regulation 17(1)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004 (Amended 2008 and 2009).

Regulation 17(1)(b) states that prior to a local authority adopting a Supplementary Planning Document they must prepare a statement setting out:

- the names of any persons whom the Council consulted in connection with the preparation of the SPD;
- how those persons were consulted;
- a summary of the main issues raised in those consultations; and
- how those issues have been addressed in the SPD.

This statement is therefore a record of the consultation undertaken during the preparation stages of the Sustainable Design and Construction SPD. This includes an informal consultation undertaken with a select number of consultees to aid the preparation of an initial draft and the formal four-week consultation undertaken in accordance with Regulation 18(1).

Background to the Sustainable Design and Construction SPD

The Consultation draft Sustainable Design and Construction Supplementary Planning Document (SPD) and supporting checklist have been produced to supersede the Sustainable Development and Construction SPD (2005) and supporting checklist (2008) to take account of changes to national planning policy and building regulations.

The consultation draft SPD and updated supporting checklist take account of user feedback by clearly defining the Council's sustainability requirements for new build developers, which are summarised below:

For residential developments sustainable design and construction requirements are based on the Code for Sustainable Homes, Building for Life Standard and the provision of on-site low and zero carbon technologies.

For non residential developments sustainable design and construction requirements are based on achieving at least a very good Building Research Establishments Environmental Assessment Method (BREEAM) rating and the provision of on-site low and zero carbon technologies.
INITIAL CONSULTATION ON THE DRAFT SPD

Who was consulted?
To aid the preparation of the SPD an initial draft was sent to a number of consultees seeking their comments prior to its formal publication. The following internal local authority officers were sent an initial draft of the SPD:

- Development Control Manager – Guildford Borough Council (GBC)
- Principal Development Control Officers – Guildford Borough Council
- Principal Climate Change Officer – Guildford Borough Council

How they were consulted?
All those consulted at this initial stage were sent an email, with the initial draft SPD attached, on 5 August 2010 seeking early comments by 27 August 2010 (a three week period).

2 responses to the consultation on the initial draft were received from:

- Principal Climate Change Officer – Guildford Borough Council
- Development Control Manager – Guildford Borough Council

Key issues raised and how they were addressed in the draft SPD
The key issue that was identified and how the Council addressed this issue is outlined below:

- The need to clearly identify the process for obtaining Code for Sustainable Homes / BREEAM certification. In light of this comment a flow chart was produced and inserted (figure 4) into the consultation document.

In addition, the issue of revised sustainability standards was discussed at the Guildford Planning Forum. The Planning Forum enables local agents and council officers to discuss best practice, emerging policy and key issues.

A small number of typographical errors and formatting issues were also identified. These were amended accordingly.
FORMAL CONSULTATION ON THE DRAFT SPD

Following the initial consultation on the draft SPD the document was then made available for a formal four week consultation in accordance with Regulation 18(1). The consultation period ran from Monday 25 October until 5pm Friday 3 December 2010.

Who was consulted?
The Sustainable Design and Construction SPD will affect all future new build development in the Borough, from a single dwelling to a major development scheme. Therefore, the Council undertook a focused consultation in accordance Regulation 17(3).

The Council therefore consulted:
- each of the specific consultation bodies in accordance with 17(3)(a) of the Regulations
- general consultation bodies considered appropriate.

How they were consulted?
Consultees were informed of the draft SPD being available for comment via email or letter (see Appendix 2 and 3). Included with the letter and attached to the email was key information including how to view the document, make comments, and the SPD Matters in accordance with the 17(2)(b) of the Regulations (see Appendix 4). In total 1096 consultation emails and 636 letters were sent.

The Council also gave notice by local advert as required by 17(2)(c) of the Regulations (see Appendix 5) and made all information available on its website in accordance with 17(2)(a) of the Regulations (see Appendices 6 and 7).

In addition, copies of the documents and supporting documentation were made available in the Borough’s libraries, at the Council Office main reception (see Appendix 8) and the Planning reception.

Key issues raised during the consultation
The Council received 18 responses to the consultation, the key issues are set out below:
1. The document does not say anything about the Council’s approach to addressing the energy efficiency of the existing housing stock. As such the balance of this document is dis-proportionate in its focus on new build.
2. The Supplement to Planning Policy Statement 1 states that any policy requirement for sustainable buildings should be set out in a DPD, not an SPD.
3. The document fails to demonstrate that stipulating Code level 4, including the 44% improvement over 2006 part L is feasible and viable. The SPD should be withdrawn and the evidence base assembled.
4. Code for Sustainable Homes Level 4 is too low and the document is not sufficiently ambitious.
5. Building for life can not be made mandatory.
6. The council should not set targets for on-site renewable energy generation. Local requirements will need to conform to the national policy on “allowable solutions” once this has been defined.

7. The impact of new technology on both historic buildings and conservation areas is not referred to.

8. The sustainable design and construction checklist is an unnecessary complication and should not be adopted.

9. The potential for exceptions to requirements is welcomed and will allow discussions to include consideration of practical and financial consequences of achieving standards.
APPENDICES
Appendix 1 - Those consulted on the Draft SPD

1st Horsley Scout Group
1st Jacobs Well Scout Group
1st Merrow Scout Group
1st Rydes Hill Scout Group
5th Guildford Scout Group
A2 Dominion
Abbotswood Resident Association Central Crescent
Abbotswood Residents Association
Abbotswood Women in Touch
Academy of Contemporary Music
Academy of contemporary Music
Active Surrey
Affinity Sutton Homes Group
Age Concern Riverside
Ahmadiyya Muslim Association UK
Albury Parish Council
Albury Trust
Alliance Planning
Allianz Insurance PLC
Ancient Monuments Society
Andy Trask Designs
Angus Farquhar
APA Planning Services Ltd
Architectural Heritage Fund
Arriva Southern Counties
Arriva Surrey and West Sussex
Arthur Waller Properties Ltd
Artington Parish Council
Artington Walk Residents Association
ASAP Architecture
Asda
Ash Action Group
Ash Citizens Advice Bureau
Ash Grange County Primary School
Ash Green Residents Association
Ash Library
Ash Manor School
Ash Parish Council
Ash Residents Action Group
Ashenden Residents Association
Ashill Developments
Ashurst & Lakeside Road Residents Association
Asian Muslim Elders Luncheon Club
Woking
Astenbell Ltd
Astolat Bowling Club
Atisreal
Austen Road Surgery
B.P. Hydraulics Ltd

Bagnall Property Consulting
Bahai Community of Guildford
Bahai Women Association
Barclay Roe
Barlow Robbins Solicitors
Barnett Spooner
Barton Willmore
Basingstoke Canal Authority
Beaufield Homes
Beckbridge Limited
Beechcroft Drive Residents Association
Bell Cornwall
Bellfields Youth & Community Centre
Bellway Homes
Bewley Homes PLC
Biodiversity Working Group
Bircham Dyson Bell
Blackwater Valley Countryside Partnership
Blackwater Valley Enterprise Trust
Blackwater Valley Friends of the Earth
Blue Sky Planning Limited
Boughton Hall Avenue Residents Association
Bovis Homes Ltd
Boxgrove County Primary School
Boxgrove Park Neighbourhood Watch and Residents Association
Boxgrove Park Residents Association
Boyer Planning Ltd
Bramley Parish Council
British Gas Properties
British Property Federation
Broadway Malyan Planning
Broadwaymalyan
Bryan Jezeph Consultancy
Bryan Smith Associates
BT Group plc
Buglear Bate and Co
Burpham Foundation Primary School
Bushy Hill Community Centre
Bushy Hill Junior School
Bushy Hill Tenants Association
Business Link Surrey
BWEA
Byfleet Parish Council
CABE
Caldecotte Consultants
Camargue Ltd
Carter Jonas
Carter Planning Ltd
Casa Developments
Castle Land and Development
CEMEX UK Properties
CGMS Consulting
Chestnut Planning
Chilworth C of E Infant School
Chris Tennant Window Cleaning Service
Christ Church
Church Lane Residents Association
Church of England
Cirrus Properties
Civic Trust
Civil Aviation Authority
Clandon C of E Infant School
Clandon Regis Golf Club
Clayton Drive Residents Association
Cobham Conservation and Heritage Trust
Cobham Way Road Fund
Coinford Design and Build
Colliers CRE
Commission for Racial Equality
Communique
Compton Parish Council
Compton Village Association
Connexions
Council for British Archaeology
Council for Romany and other Travellers
Country Land and Business Association
CPRE
CPRE Surrey Branch & Guildford District
Cranley Road Area Residents Association
Cranmore School
Crown Estate Commissioners
Crown Hall
Custom Homes
D & M Planning
D & M Planning Partnership
Daily Mail
Dairy Crest
Dairy Crest Ltd
David Lock Associates
Davis Langdon
Davis Planning
DC Planning Ltd
Deeprose Engineering Ltd
DEFRA
Department for Social Responsibility
Department for Transport
Department for Work and Pensions
Dept Culture Media and Sport
Derek Horne and Associates Ltd
Design Analysis Partnership
Dev Plan
Development Plan Services
Development Planning Partnership
Dialogue
Diocese of Arundel and Brighton
Diocese of Guildford
Disability Challengers
DisCASS
DMH Stallard
Doctors Surgery
Downsedge Residents Association
Downside & Hatchford Village Hall
DPDS Consulting Group
DPDS Regional Ltd
DPP
Dr Hornett & Partners
Dray Court
Drayton House School
Drivers Jonas
DTZ Consulting
DTZ Pieda Consulting
East Clandon Parish Council
East Guildford Residents Association
East Horsley Parish Council
EDF Energy
Edwin Road Residents Association
Effingham Parish Council
Effingham Residents and Ratepayers Association
Elmbridge Borough Council
Elstead Parish Council
Emmanuel Church
English Churches Housing Group
English Heritage
English Rural Housing Association
Environment Agency
Epsom & Ewell Borough Council
Equal Opportunities Commission
Eugena Construction
Fairlands Community Association
Fairlands, Liddington Hall and Gravetts Lane Community Assoc.
Fairview New Homes Limited
Federation of Small Business
Federation of Small Businesses
First Merrow Scout Group
Firstplan
Forestry Commission
Forestry Commission England
Frank Taylor Planning
Freight Transport Association
Friary House Residents’ Association
Friary Ward Residents Association
Friends, Families and Travellers
Furze Hill Residents Association
Fusion Online Limited
G4 Residents Association
GACC
Gardiner & Associates
Gatwick Airport
George Abbot School
Gerald Eve
Gerald Eve LLP
Girl Guiding Surrey West
GL Hearn
Gleeson Homes Ltd
Gleeson Land
Glenesk School
Goadsby and Harding Commercial
Godalming Town Council
Godfrey Chappells Ltd
GoinGreen
Gosden House School
Government Office for the South East
Green Issues Communications
Greenoak Housing Association
Gregory Gray Associates
Grenke Leasing Ltd
Grove Heath North Residents Association
Guide Dogs for the Blind
Guildford Access Group
Guildford Action
Guildford Allotment Society
Guildford Anti-Incinerator Network
Guildford Arts
Guildford Assoc. of Voluntary Service & Voluntary Action SW Surrey
Guildford Baptist Church
Guildford Boat House
Guildford Borough Council
Guildford Borough Council & Lovelace Ward
Guildford Bowling Club
Guildford Business Forum
Guildford Cathedral Church of the Holy Spirit
Guildford Chamber of Commerce
Guildford Citizens Advice Bureau
Guildford City Football Club
Guildford College
Guildford College
Guildford Community Church
Guildford Community Family Trust
Guildford Community Mediation Service
Guildford Connexions
Guildford County School
Guildford Cycle Group
Guildford Divisional Police
Guildford East Scout District
Guildford East Scouts
Guildford Environment Forum

Guildford Environmental Forum
Guildford Freiburg Association
Guildford Golf Club
Guildford High School for Girls
Guildford Institute
Guildford Interiors
Guildford Jewish Community
Guildford Labour Party
Guildford Library
Guildford Lions Club
Guildford Methodist Church
Guildford Phone Mast Campaign
Guildford Poyle Charities
Guildford Quaker Meeting
Guildford Rugby Club
Guildford Scout Council
Guildford United Reformed Church
Guildford YMCA
Guildford Youth Council
Guildfordians Rugby Club
GVA Grimley
GVA Grimley Ltd
H.C. Webb Estates Ltd
Hallam Land Management Limited
Hampshire County Council
Health & Safety Executive
Heathrow Airport
Henry Dolan & Associates
Communications Consultant
Heritage Property Services
Highways Agency
Hives Planning
HM Revenue & Customs
Hodgson Lunn & Co Architects
Hogs Back Residents Association
Holly Lodge County Primary School
Holmbury Developments Ltd
Holmwood Close Residents Association
Holy Trinity Amenity Group
Holy Trinity Church
Holy Trinity Junior School
Home Builders Federation
Home Group Ltd
Home-Start Guildford
Horsley Countryside Preservation Society
Horsley Library
House of Christian
Howard Hutton & Associates
Howard of Effingham
Howard of Effingham School
Hyder Consulting
Iceni Projects Limited
Iceni Projects Ltd
Independent Freelance
Peaslake School
Peaslake Surgery and Dispensary
Penny mead Drive Residents Association
Perry Hill Ward Residents Association
Persimmon Homes South East
Peter Pendleton & Associates Ltd
Pewley Down Infant School
P-Fava.Consulting
Philippine Association of Surrey UK
Phillip Sears Designs
Phillips Planning Services
Phillips Planning Services Ltd.
Pine Walk Residents Association
Pirbright Laboratory Residents Association
Pirbright Parish Council
Pirbright Village Primary School
Planning Magazine
Planning Perspectives
Planning Potential
Police Station
Pond Meadow Special School
Priors Field School
Property and Transport Group (GBF)
Puttenham & Wanborough Residents Assoc.
Puttenham Golf Club Ltd
Puttenham Parish Council
Qinetiq Ltd
Queen Eleanor's C of E Junior School
Queen Elizabeth Park Residents Association
R.N.Buddery F.R.I.C.S.
Radian
Ramblers Association
Rapleys LLP
Reigate and Banstead Borough Council
Ridgemount Residents Association
Ripley C of E Infant School
Ripley Carriage Ltd
Ripley Court Educational Trust
Ripley Parish Council
Rookwood Residents Association
Roseacre Gardens Residents Assoc.
Rosebery Housing Association
Rosemary Simmons Memorial Housing Association
Royal Automobile Club
Royal Borough of Kensington + Chelsea
Royal Grammar School
Royal Horticultural Society
Royal Surrey County Hospital
RPS
RPS - Planning, Transport & Environment
RPS Plc
RSC
RSPB South East Office
RT Design
RTPI
Rushmoor Borough Council
Rydes Hill Convent Prep School
Safeguard Coaches Ltd
Sakura
Sallie Hair and Beauty
Salvation Army
Sandfield County Primary School
Sanofi Aventis
Sapphire Asset Management
SCC
SCC Adult Services
SCC Youth Development Service
Scott Brownrigg
Scott Brownrigg Limited
Scott Wilson
Seale And Sands Parish Council
Seale, Sands & Runfold Amenity Society
Send C of E Infant School
Send Parish Church
Send Parish Council
Seven Signs
Seymour Estate Agents
Shackleford Parish Council
Shah Jahan Mosque
Shalford Conservation Society
Shalford Infant School
Shalford Parish Council
Shawfield County Primary School
Shawfield Day Centre
Shelter
Shere & Peaslake Scout Group
Shere C of E Infant School
Shere Parish Council
Shere Surgery & Dispensary
SHIFA
Showmans Guild of Great Britain LHC
Region
Simmons & Sons
SITA
SITEC
SMPAC
Snaky Lane Community Wildlife Group
Social and Recreational Project
South East Coast Ambulance Service
South East England Development Agency (SEEDA)
South East Planning Aid
South East Water
South West Surrey Assoc. for Mental Health
The Herpetological Conservation Trust
The House of Commons
The Housing Corporation
The Learning Corporation LLP
The Lifetrain Trust
The National Trust
The Peace Party
The Planning Bureau Limited
The Planning Inspectorate
The Raleigh School
The Ripley Society
The Rotary Club of Guildford District
The Surrey and Hampshire Canal Society
The Theatres Trust
The Trustee's of the Tyman Pension Scheme
The Twentieth Century Society
The University of The Third Age
The Victorian Society
The Woodland Trust
Three Valleys Water
Tibalds Planning & Urban Design
Tilthams Green Residents Association
Tilthams Green Residents' Association
T-Mobile
Tongham Parish Council
Tormead School
Tourism South East
Town Centre Management Group
Tribal MJP
Trustees of the Rundle Brendon Will Trust
Tyting Society
UK Association of Preservation Trusts
UNICHEM LTD
Unisport
University of Surrey
Vail Williams
Vincent Knight
Voluntary Action South West Surrey
WAAG
Waitrose
Waldon Telecom Ltd
Wanborough Parish Council
WASHA
Waverley Borough Council
West Clandon Parish Council
West End Parish Council
West Horsley Parish Council
West Retford Hotel Limited
West Send Neighbour Group
West Surrey Divisional Commander
West Surrey Society
West Waddy ADP

Westborough & District Residents Organisation
Westborough, Broadacres & District Residents Assoc.
Westfield (Friary Centre)
Westfield Shoppingtowsns Limited
Weston Lea Residents Association
Wey & Arun Canal Trust
Wey House School
Wey Valley Indoor Bowling Club
Weyfield Residents Association
Weymount Neighbourhood Group
White and Sons
White Young Green
White Young Green Planning
Whitmoor Common Association
Wildbrook Properties Ltd
Williams Brothers
Williams Property Management
Woking Borough Council
Wonersh Parish Council
Wonersh Surgery
Wood Street (St Alban's) Scout Group
Wood Street County Infant School
Wood Street Residents Association
Woodlands Park Residents Association
Woof Bond Planning
Worpslesdon County Primary School
Worpslesdon Parish Council
Wotton Parish Council
WS Planning
YMCA
Zinchome Limited
Wotton Parish Council
Youth Arts Co-ordinator
Appendix 2 – Email sent to consultees

Planning policy consultation – 26 October to 3 December 2010

We invite your comments on three planning policy documents forming part of the Guildford (Local) Development Framework (GDF) that will assist the determination of planning applications.

- Bellerby Theatre and North Place Day Centre Planning Brief Supplementary Planning Document
- Planning Contributions Supplementary Planning Document (an update to replace the Infrastructure SPD 2006 and Open Space Supplementary Planning Guidance 2002)

The consultation period runs from **Tuesday 26 October to 5pm on Friday 3 December 2010**.

For more information and to view the consultation documents, please visit our [website](http://www.guildford.gov.uk).

You can submit comments online or by emailing planningpolicy@guildford.gov.uk. The documents are available to view in local libraries and at the council’s planning helpdesk, Millmead, Guildford. If you wish to be notified of the future adoption of these documents, please state this in your response.

We also wish to inform you about amendments to the Thames Basin Heaths Special Protection Areas Avoidance Strategy tariffs, effective from 1 November 2010. Details of the new tariffs can be found on our [website](http://www.guildford.gov.uk).

You have received this email because you have responded to a consultation in the past or have requested to be on our GDF mailing list. If you no longer wish to receive information or notification of consultations about the GDF, please let us know by return email.

More information about the Guildford Development Framework is available from our [website](http://www.guildford.gov.uk).

If you have any questions, please contact us.

Kind regards

Tracey Haskins
Planning Policy Manager
Guildford Borough Council

Phone: 01483 444471

Email: planningpolicy@guildford.gov.uk
Appendix 3 – Letter sent to consultees without an email address

26 October 2010

Dear [Redacted]

Planning policy consultation – 26 October to 3 December 2010

We invite your comments on three planning policy documents forming part of the Guildford (Local) Development Framework (GDF) that will assist the determination of planning applications.

- Bellerby Theatre and North Place Day Centre Planning Brief Supplementary Planning Document
- Planning Contributions Supplementary Planning Document (an update to replace the Infrastructure SPD 2006 and Open Space Supplementary Planning Guidance 2002)

The consultation period runs from Tuesday 26 October to 5pm on Friday 3 December 2010.

For more information and to view the documents, visit our website at www.guildford.gov.uk/consultations.

You can submit comments online, by emailing planningpolicy@guildford.gov.uk or by writing to the address below. The documents are available to view in local libraries and at the council's planning helpdesk, Millmead, Guildford. If you wish to be notified of the future adoption of these documents, please state this in your submitted comments.

We also wish to inform you about amendments to the Thames Ration Heaths Special Protection Areas Avoidance Strategy tariffs, effective from 1 November 2010. Details of the new tariffs can be found on our website at www.guildford.gov.uk/tbhsa.
You have received this notification because you have responded to a consultation in the past or have requested to be on our GDPR mailing list. If you no longer wish to receive information about the GDPR, please let us know. We have sent this letter because we do not have an email address for you. If it is possible to contact you by email in the future, please provide us with your details.

More information about the Guildford Development Framework is available from our website at www.guildford.gov.uk/df.

If you have any questions, please contact us:

Yours Sincerely

Tracey Haskins
Planning Policy Manager
STATEMENT OF SPD MATTERS
SUSTAINABLE DESIGN AND CONSTRUCTION SUPPLEMENTARY PLANNING DOCUMENT (SPD)
CONSULTATION 26 OCTOBER – 3 DECEMBER 2010

This Statement has been prepared under regulations 16 and 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

The draft Supplementary Planning Document (SPD) referred to above details the minimum standards for improved environmental performance in building design and construction in Guildford Borough. It aims to provide detailed, up to date and clear advice on relevant sustainable design policies, improve the environmental performance of new build developments in the Borough and deliver relevant national and local targets, particularly new build zero carbon housing by 2016 and reductions in CO2 emissions.

Representations on the draft SPD must be submitted in writing from the date of this statement and no later than 5pm Friday 3 December 2010.

Written representations should be made by post to the following address:
Carol Humphrey,
Head of Planning Services
Guildford Borough Council
Millmead House
Millmead,
Guildford
GU2 4BB

Or by completing our online consultation form which can be accessed from our consultation webpage: www.guildford.gov.uk/consultations

Or by email to: planningpolicy@guildford.gov.uk

If you wish to be notified of the future adoption of these documents at the postal or email address you have given, please let us know.

Carol Humphrey
Head of Planning Services
26th October 2010

Appendix 5 – Public notice by advert of the consultation

GUILDFORD BOROUGH COUNCIL

Planning and Compulsory Purchase Act 2004, Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)

LOCAL DEVELOPMENT FRAMEWORK DRAFT SUPPLEMENTARY PLANNING DOCUMENTS (SPD)

Consultation 26 October – 3 December 2010

Bellerby Theatre and North Place Day Centre Planning Brief provides guidance for redevelopment of the site including suitable land uses, highways issues, and scale of new buildings.

Planning Contributions explains the types of planning obligations and conditions that may be required from developers including affordable housing provision, and open space standards.


View the documents online at www.guildford.gov.uk/consultations, or at the Council Offices, Millmead House, Millmead, Guildford, GU2 4BB or Guildford, Ash and Horsley (and mobile) libraries during normal opening hours.

Comments can be made on the website, by email to planningpolicy@guildford.gov.uk, or send to Planning Services, Guildford Borough Council.

Comments must be received by 5pm 3 December 2010. Please advise if you wish to be notified of the future adoption of these documents at the address you have given. For further information contact the Planning Policy team 01483 444471
Appendix 6 – The Councils website with information on the consultation

Planning policy consultation

Have your say.

We are consulting on three planning documents between 28 October and 3 December 2010:

- Bellway Theatre and North Place Day Centre Planning Brief Supplementary Planning Document
- Planning Contributions Supplementary Planning Document (an update to replace the Infrastructure SPD 2005 and Open Space Supplementary Planning Guidance 2002)

We invite your comments on these documents forming part of the Guildford (Local) Development Framework (SDF) that will assist the determination of planning applications.

To view and comment on the documents visit our consultation pages using the links in the related pages section.
Appendix 7 – The draft Sustainable Design and Construction SPD consultation webpage

Consultation Draft Sustainable Design and Construction Supplementary Planning Document

The Consultation draft Sustainable Design and Construction Supplementary Planning Document (SPD) and supporting checklist have been produced to support the Sustainable Development and Construction SPD (2008) and supporting checklist (2008) to take account of changes to national planning policy and building regulations.

The consultation draft SPD and updated supporting checklist take account of user feedback by clearly defining the Council’s sustainability requirements for new-build developers, which are summarised below.

For residential developments sustainable design and construction requirements are based on the Code for Sustainable Homes (Level 4 as a minimum), Building for Life Standards (good as a minimum) and the provision of on-site low and zero carbon technologies (e.g. solar energy, ground source heat pumps) to reduce the developments carbon emissions by at least 10%.

For non-residential developments sustainable design and construction requirements are based on achieving at least a very good Building Research Establishment Environmental Assessment Method (BREEAM) rating and the provision of on-site low and zero carbon technologies (e.g. solar energy, ground source heat pumps, combined heat and power) to reduce the developments carbon emissions by at least 10%.

Sustainable Design and Construction Checklist

To ensure compliance with the consultation draft sustainable design and construction checklist the Council will require:

- a completed Code for Sustainable Homes / BREEAM pre assessment estimate to be attached to the completed sustainable design checklist;
- a final certification and assessment report to be submitted through a planning condition prior to the occupation of buildings.

Supporting Documentation

To comply with European legislation and our Government’s regulation the SPD has been subject to the following screening assessments:

- Environmental Impact Assessment (EIA) screening considers the impacts of the SPD on specific groups within the community. The EIA screening document can be downloaded from the links on the right.
- Habitats Regulation Assessment (HRA) screening enables us to assess whether there is likely to be any impacts on internationally important habitats (Special Protection Areas (SPA) and Special Areas of Conservation (SAC)) and how significant the effects are likely to be. The HRA screening document can be downloaded from the links on the right.
- Strategic Environmental Assessment (SEA) screening enables us to assess the potential environmental impacts of the SPD on the environment. The SEA screening document can be downloaded from the links on the right.

Respond to the Consultation

To respond to the consultation please use our online response form that can be accessed under related pages on the right of this page. Alternatively, send your comments to the address below:

Contact us

Planning Policy
Planning Services
Guildford Borough Council
Millennium House
Guildford
GOSFORD
United Kingdom
Telephone: +44 (0)1483 642971
Email: Planning@Guildford.gov.uk
Web: www.guildford.gov.uk

Notes to the Editor: | Privacy Notice | Contact us | Feed this page | Top

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Download:
Appendix 8 – Document advertised and made available in the main reception of the Council Office
### Appendix 9 – Consultation Responses and the Council's response

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Response</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kath Harrison</td>
<td>Surrey County Council</td>
<td>This document appears to provide a sound basis for sustainable design and construction. The application of level Code for Sustainable Homes level 4 to all housing, even single units, is particularly welcomed as a strength of this SPD.</td>
<td>Support noted.</td>
</tr>
<tr>
<td>Jane Griffin</td>
<td>South East England Development Agency (SEEDA)</td>
<td>Thank you for consulting SEEDA on these documents. However they do not appear to be of a strategic nature so on this occasion I will not be responding</td>
<td>Comments noted. No change.</td>
</tr>
<tr>
<td>Jennifer Pope</td>
<td>Bat Conservation Trust</td>
<td>Please find attached documents on bats and planning. Protected species should be taken into consideration before a application is determined, and if bats are likely to be present, a bat survey should be requested. If you have any further queries, please contact the Bat Helpline on 0845 1300 228.</td>
<td>Comments noted. No change.</td>
</tr>
<tr>
<td>James Stevens</td>
<td>Home Builders Federation (HBF)</td>
<td>We question whether the measures proposed will help to improve energy costs for householders. There is no evidence to support this. Indeed the costs of maintaining many onsite renewables is likely to prove costly for residents and these costs are expected to rise once State subsidy is reduced.</td>
<td>On-site renewable technologies such as solar PV and solar thermal can reduce residents demand for mains supplied energy and therefore reduce their energy costs as they will not be subject to price hikes. In addition, the introduction of the feed in tariff rewards home owners who install certain renewable energy technologies. The tariff can also benefit people who purchase a new build property with specific renewable energy systems installed (e.g. solar PV).</td>
</tr>
<tr>
<td>James Stevens</td>
<td>Home Builders Federation (HBF)</td>
<td>Overall, the document says nothing about the council's approach to addressing the energy efficiency of the existing housing stock. As such the balance of the document is dis-proportionate in its focus on</td>
<td>We recognise that the document predominantly focuses on new build developments. The reasoning for this</td>
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</table>
new build to the exclusion of other elements of the built environment. We are unconvinced that the focus of this SPD upon new residential development is appropriate. If Guildford is to address reducing its carbon emissions then it must address other areas, including energy infrastructure and existing homes.

<table>
<thead>
<tr>
<th>James Stevens</th>
<th>Home Builders Federation (HBF)</th>
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<tbody>
<tr>
<td></td>
<td>It is misleading to ascribe the Government’s programme for all new homes to be built to zero carbon standards from 2016 onwards as an objective of the Council as page 14 of the document suggests. This is a national programme, and one which was agreed by industry with Government, experts, academics as well as representatives of local government.</td>
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We agree that the text could be clearer. **The text in paragraph 3.8 has been revised so that it clearly states that zero carbon homes is a national programme.**

<table>
<thead>
<tr>
<th>James Stevens</th>
<th>Home Builders Federation (HBF)</th>
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<tbody>
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<td></td>
<td>The document is also misleading in suggesting that the achievement of the zero carbon objectives will be secured through specifying levels of the Code for Sustainable Homes. The Code is something entirely separate to the zero carbon programme. The Code will remain voluntary for market homes but any local requirements specifying compliance to certain levels must be justified. Paragraph 31 of the Supplement to PPS1 states: “When proposing any local requirements for sustainable buildings planning authorities must be able to demonstrate clearly the local circumstances that warrant this.”</td>
</tr>
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</table>

Comments noted. The Council has successfully required Code Level 3 from new build developments since May 2008. We consider that the revised requirements for developments to meet Code Level 3 as a minimum are both achievable and deliverable, and that the Borough’s large environmental footprint and Local Plan Policy basis justify such an approach. **Action: The document has been revised to require Code Level 3 as a minimum standard**

<table>
<thead>
<tr>
<th>James Stevens</th>
<th>Home Builders Federation (HBF)</th>
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<td></td>
<td>Paragraph 33 of the Supplement to PPS1 states that any policy requirement for sustainable buildings should be set out in a DPD, not SPD. This is necessary to ensure independent examination and to ensure that what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure). The SPD for this reason should be withdrawn and its proposals advanced through the preparation of Guildford’s Core Strategy.</td>
</tr>
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</table>

Whilst we recognise that the Supplement to PPS1 states that a policy requirement for sustainable buildings should be set out in a DPD we consider the over-arching objectives of sustainable development and the governments commitment to deliver the ambitious targets set out in the Climate Change Act justify the Council requiring
developers to a specified Code Level, specifically in light of the age of the Local Plan and the delays we have faced in progressing the Core Strategy.

| James Stevens | Home Builders Federation (HBF) | It is unclear from the document what work the Council has undertaken to plan to ensure that this necessary supporting infrastructure will be provided and in place in time to enable these targets to be met, even though this is a requirement of the Supplement to PPS1 (paragraphs 31, 32 and 33). | Action: The document has been revised to require Code Level 3 as a minimum standard which the Council has successfully required since May 2008. This will not require significant supporting infrastructure. |
| James Stevens | Home Builders Federation (HBF) | We appreciate that there may be instances where a local authority may wish to set levels of building sustainability that anticipate those set nationally but as paragraph 31 of the Supplement to PPS1 clarifies, there must be adequate evidence to demonstrate that this is feasible and viable, having regard for the impact on development (paragraph 33). As paragraph 31 states::

“When proposing any local requirements for sustainable buildings planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this. These could include, for example, where:
- There are clear opportunities for significant use of decentralised and renewable or low carbon energy; or
- Without the requirement, for example on water efficiency, the envisaged development would be unacceptable for its proposed location.”

The document fails to demonstrate that stipulating Code Level 4, including the 44% improvement over 2006 Part L, is feasible and viable. | We acknowledge that the document fails to demonstrate that Code Level 4 is feasible and viable. Action: The document has been revised to require Code Level 3 as a minimum standard which the Council has successfully required since May 2008. |
| James Stevens | Home Builders Federation (HBF) | We would also draw attention to paragraph 33 of the Supplement to PPS1 that states that:

“in the case of housing development and when setting development area of site specific expectations, (local authorities) should demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing…” | Comments noted: Action: the document has been revised to require Code Level 3 as a minimum standard which the Council has successfully required since May 2008. |
Information from the Zero Carbon Hub demonstrates that achieving an improvement of 44% above 2006 Building Regulations is not feasible in residential schemes without the use of costly on-site renewables and/or off-site solutions. Furthermore, opportunities for off-site solutions are limited in most areas as the energy infrastructure is not yet in place and it is unrealistic to expect house builders to be able to finance the provision of the latter (such as district heating networks). The policy is unachievable and not supported by sufficient evidence (such as a district energy map) to indicate whether it can be delivered over the next three years (2010-2013). By contrast, the Government’s own analysis of the costs set out in the Code for Sustainable Homes: A cost review (CLG, March 2010) - a more thorough and comprehensive study than any previously carried out - indicates that adhering to the agreed programme offers the best chance of achieving zero carbon from 2016 and maintaining housing delivery in the interim. Through the development of its core strategy, Guildford should adhere to national standards, including the agreed programme to zero carbon. This is essential to ensure development remains viable while avoiding confusion and fragmentation of market signals for the supply chain to help it gear up to the new regulatory standard. If the 2013 and 2016 regulations change then the council's core strategy policy can be worded in such a way to allow it to reflect such changes.

We consider the over-arching objectives of sustainable development and the government’s commitment to deliver the ambitious targets set out in the Climate Change Act justify the Council requiring developers to a specified Code Level, specifically in light of the age of the Local Plan and the delays we have faced in progressing the Core Strategy.

<table>
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<tr>
<th>Action 1</th>
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<td>The proposal to set Code Level 4, which includes a 44% improvement over 2006 Part L, is unjustified as it is not evidence based. The SPD should be withdrawn and an evidence base assembled to demonstrate that the target is feasible. The second paragraph of Action 1 is also contrary to the Supplement to PPS1 in requiring developments to submit assessments and interim certification. Paragraph 11 of the Supplement states that: “Specific and standalone assessments of new development should not be required where the requisite information can be made available to the planning authority through submitted Design and Access Statement, or forms part of an environmental impact assessment of other regulatory requirement…”</td>
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Comments Noted. **Actions:**
- The document has been revised to require Code Level 3 as a minimum standard.
- The checklist has been withdrawn and will not be adopted.
| James Stevens | Home Builders Federation (HBF) | **Action 2**  
Building for Life is a scoring system that was devised by the HBF, and later developed in conjunction with CABE. It has always been voluntary. It cannot be made mandatory.  
Whilst Building for Life is a voluntary standard, we consider that it is a useful assessment method for assessing the sustainability of residential developments which will result in improving the quality of new build development in the Borough.  
**Action:** The text for Action 2 has been revised to state ‘**Building for Life will inform discussions concerning design quality at the pre-application stage. Developers of major residential schemes will be expected to engage with the Council at an early stage in the design of the development to achieve at least a Good BfL standard**’. |
|---|---|---|
| James Stevens | Home Builders Federation (HBF) | **Action 4**  
We object to the stipulation that at least a 10% reduction in carbon emission should be achieved through the use of onsite technologies (and 15% for developments of 5,000sqm or more). The Council should not set targets for on-site renewable energy generation. The policy is out of step with emerging Government thinking (the draft replacement PPS1) and should be deleted. The need for a policy is unnecessary in the light of the Government’s proposed 2013 revisions to Part L of the Building Regulations. Merton-style policies stipulating a defined level of renewables on-site are no longer supported by Government partly because greater long-terms benefits can be achieved through fabric efficiency and because onsite renewables may not represent the most effective way of achieving reductions on CO₂ emissions, especially if a site is served by a district energy system or via the national grid from a source of renewable energy. The rationale for any specific on-site generation policy is rapidly disappearing as a result of the national zero carbon policy, but in any event all decisions need to be taken in relation to the specific development context in accordance with the draft replacement to PPS1 (policy LCF8). Local requirements will need to conform to the Comments noted.  
The Council has successfully required Code Level 3 of the Code for Sustainable Homes and 10% of on site energy demand to be provided by renewable sources since May 2008. Therefore, in light of the Council’s established practice over the past two and a half years we have revised the SPD to require a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies. This requirement aligns with the updated Code for Sustainable Homes Technical Guide (November 2010) and will reward developers with one code credit under ENE 7.  
In addition, the recent introduction of the feed in tariff is likely to appeal to those looking for a new home and add to the saleability of properties in the Borough. |
national policy on “allowable solutions” once this has been defined, but national policy, on the basis of the draft PPS, is likely to phase out Merton-style rules specifying targets for energy generation from on-site renewables as this will no longer be necessary. The requirement should be deleted. However, it is important to note the Sustainable Design and Construction SPD acknowledges constraints and viability (paragraphs 1.9 and 1.10) and Action 4 states that 10% reduction is the standard unless agreed in writing by the council. We therefore, consider that sufficient flexibility is provided in the SPD. **Action: Low and Zero Carbon Technology targets revised to require a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies.**

<table>
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<tr>
<th>Rachel A, Bust</th>
<th>The Coal Authority</th>
<th>Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</th>
<th>Comments noted. No change</th>
</tr>
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<tbody>
<tr>
<td>David Fazakerley</td>
<td>William Lacey Group PLC</td>
<td>Code for Sustainable Homes- this proposal is contrary to the advice contained in PPS1 which states that ‘specific and stand alone assessments of new developments should not be required where requisite information can be made available to the planning authority through submitted Design and Access Statements, or forms part of an environmental impact assessment or other regulatory requirement… and would as that it be withdrawn.</td>
<td>Comments noted. <strong>Action: The checklist has been withdrawn and will not be adopted</strong></td>
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**David Fazakerley**  
William Lacey Group PLC  

10% and 15% on site reduction in carbon emissions, this proposal will be ‘at odds’ with the Governments draft replacement for PPS1 and we ask that it be withdrawn from the SPD.  
The Council has successfully required Code Level 3 of the Code for Sustainable Homes and 10% of on site energy demand to be provided by renewable sources since May 2008. Therefore, in light of the Council’s established practice over the past two and a half years we have revised the SPD to require a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies. This requirement aligns with the updated Code for Sustainable Homes Technical Guide (November 2010) and will reward developers with one credit under ENE 7.
In addition, the recent introduction of the feed in tariff is likely to appeal to those looking for a new home and add to the saleability of properties in the Borough. However, it is important to note the Sustainable Design and Construction SPD acknowledges constraints and viability (paragraphs 1.9 and 1.10) and Action 4 states that 10% reduction is the standard unless agreed in writing by the Council. We therefore, consider that sufficient flexibility is provided in the SPD.

**Actions:**
- LZCT targets for residential developments revised to require a 10% reduction in carbon emissions from residential developments.
- LZCT targets for non-residential developments revised to complement South East Plan Policy NRM 11 by requiring a 10% reduction in carbon emissions for developments of 1,000sqm or more.

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<tr>
<th>Name</th>
<th>Organization</th>
<th>Comment</th>
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<tr>
<td>John Baylis</td>
<td>The Guildford Society</td>
<td>The view of the Society, especially as far as central Guildford is concerned, is that while the general thrust of this SPD is commendable, we do have a particular concern as follows. The impact of new technology on both historic buildings and conservation areas is not referred to. Our concern is that the situation could occur where well-meaning but undesirable proposals could be submitted for approval in these cases.</td>
</tr>
<tr>
<td>Carmelle Bell</td>
<td>Thames Water Property Services</td>
<td>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be coordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. We therefore support the comments at paragraphs 8.5-8.8.</td>
</tr>
<tr>
<td>David Rix</td>
<td>Paragraph 1.12</td>
<td>Recent data published by the Stockholm Environmental Institute concludes that in 2006 Guildford Borough had the 19th largest environmental footprint and 22nd highest Green House Gas Emissions of all local authorities in the UK (435 in total). The above rankings can be attributed to the following factors: Guildford is an affluent borough with high levels of car ownership and usage. A sizable proportion of the existing housing stock is performs poorly in</td>
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terms of energy efficiency. The Borough is congested and contains a major arterial route (the A3) which results in high levels of emissions?

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<thead>
<tr>
<th>Ian Macpherson</th>
<th>IMPACT ANALYSIS MISSING?</th>
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<tr>
<td>Effectively, an adopted SPD is supplementary legislation [broadly parallel in this case to the Building Regulations], and should be treated as such. The start must be that the proposals lack any proper 'Impact Analysis'. Although the text suggests that the requirements broadly follow the 2005 SPD, this is not the case. There are substantial changes in the descriptive text and some material alterations in the compulsory requirements [ eg in 2005 new residential property was required to have a SAO of 100; it is now to be required to comply with the &quot;Code for Sustainable Homes&quot; Level 4. It is now required for any UK and EU Government proposal for legislation to be supported by an 'Impact Analysis', which can simplistically be thought of as a cost-benefit analysis with examination of alternatives. Comments noted. The SPD has been revised so that the requirements are broadly in line with those contained in the Sustainability Checklist (May 2008). Therefore, there will be no significant impact with the introduction of the SPD and an impact analysis is not required in this instance.</td>
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<tr>
<th>Ian Macpherson</th>
<th>SMALL AND MEDIUM SIZED ENTERPRISES</th>
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<td>I would also have expected to find a specific analysis of the impact of the proposals on SME's. There is at the moment no formal requirement for Local Authorities to carry out an Impact Analysis, but it is clearly good practice. In particular, the proposal that all new dwellings comply with the energy requirements of the Code for Sustainable Homes three years in advance of that becoming a national requirement clearly has a cost as well as benefits and there is no worked argument in the text to justify this. Comments noted. Action: The document has been revised to require Code Level 3 as a minimum standard which broadly aligns with the Building Regulations and therefore shouldn't present any major impact upon SME's who have successfully delivered homes in the Borough to code level 3 since May 2008.</td>
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<tr>
<th>Ian Macpherson</th>
<th>EUROPEAN LAW</th>
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<td>The text demands an assessment of new dwellings against the Code for Sustainable Homes [CSH], and of commercial buildings against BREAM, in both cases to be carried out by accredited assessors. GBC will be aware that, inter alia, European legislation does not, except in special cases, permit legislation or quasi-legislation effectively to ban the use of acceptable alternative products or services from other Member States. The existence of CSH or BREAM, or their accredited assessors, presents no problem, as such, but the unique referencing might. Here, for example, people</td>
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Comments noted. Action: Paragraph 3.9 has been revised to take account of the alternative standards that applicants or developers may wish to achieve, such as Passivhaus or BREEAM communities. |
may wish to use the 'Passivhaus' system, or the work under Energie Cites or the 'LEED' [USA] system. This issue has been taken care of in the Building Regulations, where the Approved Documents state that it is possible to satisfy the Regulations in ways other than that set out in the Approved Document [it might be noted that some other Government documents remain open to challenge]. The revision of this SPD draft should therefore include a few words at the beginning accepting the possible use of alternative solutions.

**Ian Macpherson**

**Duplication of Legislative Requirements**
This SPD duplicates and anticipates requirements in other legislation and elsewhere in the Planning administrative process. This is frowned upon in "Planning and Climate Change": supplement to PPS1, where

- para 11 reads:-
  "- - controls under the planning, building control and other regulatory regimes should complement and not duplicate each other. Standalone assessments of new development should not be required where the required information - - - through the Design and Access Statement - - -":

- para 31 reads:-
  "There will be situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance - - - demonstrate clearly the local circumstances - - - "[not done here - see below].

- para 33 reads:-
  "Any policy relating to local requirements for decentralised energy supply to new development should be set out in a DPD, not a supplementary planning document - - - "

**Comments noted:**

**Actions**

- a. The checklist has been withdrawn and will not be adopted.
- b. The final document requires code level 3 as a minimum (reduced from Code Level 4).
- c. Action: LZCT targets revised to require a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies.

**Ian Macpherson**

**Introduction**
That Guildford has a higher than average consumption of energy per capita is largely to be expected. It is perhaps a reflection of the higher than average income per capita, and therefore the ability to purchase more space and to fund the heating of the greater space. However, of the 6.6 million solid-wall houses there are proportionally considerably more in the North [the reverse of para 1.12], which by some yardsticks are a greater priority. And the higher consumption arises out of the existing stock of buildings - the additional new

Whilst new build stock will not make a significant impact to the level of housing stock in the Borough over the short term to medium term, if we factor in the lifecycle of a typical home it is import that new dwellings are designed and constructed to high standards of sustainability and minimise their carbon emission (e.g. achieve a Code for Sustainable
| **Ian Macpherson** | **7-1 Biomass**
Biomass and its usual corollary, District Heating, appears not to be discussed in depth anywhere. The Building Regulation and other Government consultations appear to think that this is an issue particularly for Planning Authorities, and planning powers are needed in the general case to make such systems viable. Does GBC have proposals/ views about its role? | Biomass fuel systems are used in the Borough, with the Council Offices at Millmead operating a Biomass Boiler. The SPD does not provide detail on all types of Low and Zero Carbon Technologies however this does not mean that the Council will not explore such infrastructure. For example, opportunities for district heating and biomass will be explored for any future development as part of the Slyfield Area Regeneration Project. |
| **Ian Macpherson** | **7-2 Thresholds**
It is not clear to me why a threshold of 1 or 10 dwellings [100 to 1000 sq m] brings in higher standards [10% to 15%] whereas for non-residential the thresholds are 1000 sq m [10%] to 5000 sq m [15%], when it is generally easier for large scale commercial developers to comply than small scale housebuilders. | Comments noted.  
**Actions:**  
LZCT targets for residential developments revised to require a 10% reduction in carbon emissions from residential developments.  
LZCT targets for non-residential developments revised to complement South East Plan Policy NRM 11 by requiring a 10% reduction in carbon emissions for developments of 1,000sqm or more. |
| **Ian Macpherson** | **Historic Buildings and Conservation Areas**
Nowhere does the draft mention that some of the proposals could have a serious effect on the setting of historic buildings or conservation areas. This issue was discussed intelligently in the 2005 SPD [paras 39 to 43 "Heritage Landscape"]. It is not at all clear why it has disappeared. The requirement for renewable energy, for example, could, if taken through, lead to new buildings introduced into conservation areas to be covered with solar collectors or wind turbines. There is a policy statement in the introductory to the Building Regulations Approved Documents which sets out generally accepted policy, and it is highly desirable that it or some paraphrase be added into this draft, or a redraft of the paragraphs in the 2005 document. | Comments noted.  
**Action:** additional text inserted in Section C (page 24) |
On energy, it seems to be generally held and as the draft notes, the energy conservation requirements in the Building Regulations [2010] roughly equate to Code for Sustainable Homes Level 3. They will go up to Level 4 in 2013. The Building Regulations programme is justified at length in its consultation papers.  

**Action 1 - Code Level 4**

The Guildford requirement that Level 4 energy conservation be introduced immediately - ie bringing forward by three years - is nowhere justified, except by reference to a 'targets' approach covering all aspects of energy use, including transport. It fails to “demonstrate clearly the local circumstances - - - ”

The move to Level 4 will increase costs. Estimates have been published, prepared by DCLG and others [ eg ‘Building’]; conservative estimates as they are based on largish schemes. Some of the additional cost might be saved by the householder over a period of time in decreased fuel bills. That will probably not be of much interest to the 'Six Bed on the Hills' market, and [more importantly] will, at the other end, hinder affordable entry to the “housing ladder”

**ACTION 2 - BUILDING FOR LIFE**

Note that much of this will be taken care of through the Building Regulations et al, though these points can be re-stated in the Design and Access Statement without much hardship.

**ACTION 3 – BREEAM Very Good**

BREAM is duplicated by other assessment systems [ eg those used by other European M/S and/or written under ISO 21931:2010] and, as noted above, it would be as well if the SPD showed itself open to these. More particularly, the Passivehaus methodology has now apparently been successfully applied in the UK to commercial buildings, and, for the aspects covered, it would appear to be generally recognised in the technical world as a possibly superior system.

The energy aspects of BREAM duplicate the Building Regulations. Under the Building Regulations it is required that a detailed compliance report be submitted at initial design stage. It is surely undesirable that a second compliance report where it covers the same subject area be submitted under Planning?

**Actions:**
- text revised to highlight that alternatives to BREEAM are available and will be considered by the Council.
- The checklist has been withdrawn and will not be adopted.
**ACTION 4 - ON-SITE LOW AND ZERO CARBON TECHNOLOGIES**

This proposal, as far as I can see, cuts right across the staged development of the Building Regulations and the careful analysis of options that goes with the development of the Regulations 2016 Zero-Carbon thinking. The Government has established a programme of technology development funded by the 'feed-in tariff', and there is no obvious place for a further proliferation of local technical standards. Moreover much of the available technology brings with it potential problems [eg noise nuisance] and a blanket rule, as here, cuts across major environmental considerations, I cannot find much about in this draft SPD.

The technology at present is in general not cost effective, and it should be appreciated that 'money' is a proxy for 'resources'; i.e. adopting a not-cost-effective solution is anti-sustainable, and can only be justified for pressing external reasons.

The Council has successfully required Code Level 3 of the Code for Sustainable Homes and 10% of on site energy demand to be provided by renewable sources since May 2008. The majority of developments have met this requirement through the installation of solar pv, solar thermal technologies or ground source heat pumps. Therefore, in light of the Council’s established practice over the past two and a half years we have revised the SPD to require a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies. This requirement aligns with the updated Code for Sustainable Homes Technical Guide (November 2010) and will reward developers with one credit under ENE 7.

In addition, the recent introduction of the feed in tariff is likely to appeal to those looking for a new home and add to the saleability of properties in the Borough. However, it is important to note the Sustainable Design and Construction SPD acknowledges constraints and viability (paragraphs 1.9 and 1.10) and Action 4 states that 10% reduction is the standard unless agreed in writing by the council. We therefore, consider that sufficient flexibility is provided in the SPD.

**SECTION D: FURTHER GUIDANCE**

12-D1 It seems not fully appreciated that design for solar gain increases the risk of summer overheating, and, as 1.3 notes, this is as much likely to be a major and increasing future problem as the need to reduce CO2.

12-D2 Water

Commented above that the move to Code Level 4 before 2013 is

Whilst overheating can be an issue, if buildings are well designed these issues can be alleviated through the use of passive ventilation systems.

The Council has successfully required new
undesirable. The case for the specific immediate local move to 105 litres/day is not supported by any local argument in the text. The Guildford area is not an area of acute water shortage.

SUDs
Action on SUDS will follow from the Flood and Water Management Act 2010, and will probably lie with the County Council. Duplication here looks like being undesirable.

Flood Risk

12-D3 Ventilation and Cooling
This section deals in detail with the construction technology of buildings. It is covered in the Building Regulations and does not look appropriate for a planning SPD. What a 'Planning' text should perhaps be discussing is the use of layout to provide adventitious cooling and shade [cross refer to D5]

12-D4 Materials
These do not look like planning matters. Explanatory material here is not helpful and is perhaps better dropped. If material must be provided, there are National Standards, European and International initiatives in this area which should be noted, as these are the reference material that the industry uses.

Ian Macpherson

**Action 5**

13-D5 Biodiversity and climate change mitigation
As noted earlier, Guildford development is likely to be mainly small 'windfall' sites. While the advice to incorporate 'green networks' and plant biodiverse trees may make sense on the occasional larger site, surely it is inapplicable on smaller sites? As written, the focus on large sites in this Action is confusing.

13-D6 Transport and Access
As noted earlier, Guildford development is likely to be mainly small 'windfall' sites. While the advice to incorporate pedestrian and cycle routes and incorporate public transport may make sense on the homes in the Borough to achieve at least Code Level 3 since May 2008. These developments have had to achieve water consumption rates of 105 litres/day to satisfy the mandatory requirements of Code Level 3. We consider it is important to provide information to members of the public and developers on SUDS techniques.

We recognise that a number of these issues are addressed through Building Regulations Part F but the purpose of this section of the SPD is to provide all potential users of the document with non prescriptive guidance on ventilation and cooling issues.

The purpose of this section of the SPD is to provide all potential users of the document with a brief overview of issues concerning building material selection. Materials are a core component of the Code for Sustainable Homes (refer to the Technical Guide for further information).

Comments noted. The guidance on landscaping (paragraphs 5.22 – 5.24) can be applied to all developments in the Borough. In addition, the guidance on the retention of existing trees can apply to small developments of 1 or more dwellings.

**Action:** Guidance section D5 has been updated and Action 5 removed.
occaisional larger site, it is inapplicable on smaller sites. As written, the focus on large sites in this Action is confusing. Larger sites can be treated as a special, and a specific brief written.

EQUALITY IMPACT ASSESSMENT
“ The associated reduction in carbon emissions from new development and climate change mitigation measures will benefit everyone that lives, works and visits the Borough”. This is ‘stretching a point’. The contribution is across the world, not the borough. A small reduction in 300 houses a year, against the 30 million existing in the UK and the billions of carbon emitters across the world puts this benefit into something like the tenth decimal point. This is ‘de-minimis-non-curat-lex’, and would be unlikely to stand up in court.

The most that could be said [if it is necessary to say anything] is that it is a local contribution to Government policy on climate change.

Historic Buildings-
The sensitive subject of historic buildings and conservation areas appears to be treated very usefully in the 2005 SPD [e.g. paras 39-43], and it is not clear why the text has been dropped. This concerns me greatly, and I would like to record a formal objection.

I add the reference below, which will be well known to GBC, as a possible alternative source of words.

(source Building Regulations Approved Document G)

“ Historic buildings
The types of building work covered by this Approved Document may include

WORK ON HISTORIC BUILDINGS. HISTORIC BUILDINGS INCLUDE:
(a) listed buildings;
(b) buildings situated in conservation areas;
(c) buildings which are of architectural or historic interest and which are referred to as a material consideration in a local authority’s development plan; and
(d) buildings of architectural and historical interest within national parks, areas of outstanding or natural beauty and world heritage sites.

Special considerations may apply if the building on which the work is
to be carried out has special historic or architectural value and compliance with the sanitation or hot water safety requirements would unacceptably alter the character or appearance of the building or parts of it.
When undertaking work on or in connection with buildings with special historic or architectural value, the aim should be to improve sanitation and hot water safety where and to the extent that it is possible provided that the work does not prejudice the character of the host building or increase the risk of long-term deterioration to the building fabric or fittings.
In arriving at a balance between historic building conservation and sanitation or hot water safety requirements, it would be appropriate to take into account the advice of the local authority’s conservation office before work has begun.

Gregory Gray Associates on behalf of First Wessex Housing Group Ltd.

The requirement for all new homes to be constructed to Code for Sustainable Homes Level 4 is unjustified, redundant and onerous.

National advice does not require such a high level of construction to be implemented at this time. It is not consistent with national policy nor is it based on adopted Local Plan or Core Strategy policies.

PPS12: Local Spatial Planning states that “A Planning Authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its DPDs.”

There are no ‘saved’ policies in the Local Plan that set out the requirement to provide homes to ‘Code’ Level 4. Although references are made within the Core Strategy Further Options Consultation under Policy 20, this cannot be relied upon as this has not been publicly examined or adopted (nor is it a Submission stage document).

In addition a Supplementary Planning Document dealing with the issue of provision of dwellings to meet a particular ‘Code’ level is redundant in any case. Paragraph 3.6 and Figure 2 within the draft consultation version of the Sustainable Construction SPD amply

Action: The document has been revised to require Code Level 3 as a minimum standard which broadly aligns with Part L of the Building Regulations. The Council has successfully required new homes in the Borough to achieve at least Code Level 3 since May 2008.
demonstrates that amendments to Building Regulations part L will control delivery of zero carbon homes. It is therefore unnecessary to duplicate this legislation through SPDs.

Finally the current economic climate predicates against setting the bar higher locally earlier than required by national legislation. Registered Social Landlords are no longer being required to provide affordable housing at ‘Code’ level 4. The Government has recently announced that the new HCA standards for homes built with public funding or on public land will not be introduced. These had been predicted to add £8000 to the average cost of each new affordable home, which is clearly difficult to justify currently at a national level.

The requirement to produce homes to ‘Code’ level 4 under this Supplementary Planning Document is therefore out of step with current thinking at national level. It is a premature application of policy and an unnecessary duplication of another form of regulation.

Our client therefore objects to this requirement and considers the SPD unnecessary and that it should not be adopted.

<table>
<thead>
<tr>
<th>Gregory Gray Associates on behalf of First Wessex Housing Group Ltd.</th>
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<tbody>
<tr>
<td>Given our client’s fundamental objection to the Sustainable Design and Construction SPD, the Checklist is also considered redundant.</td>
</tr>
<tr>
<td>The earlier checklist was a much simpler and clearer document. This replacement is unduly complicated and an unnecessary duplication of alternative Building Regulation legislation.</td>
</tr>
<tr>
<td>In particular given that national advice is the adoption of the ‘Code’ for private sector housing is voluntary and that public sector housing is not currently required to be provided at ‘Code’ Level 4 nationally, the requirements set out in this checklist will do nothing but delay validation of submissions unnecessarily and therefore delivery of much needed housing.</td>
</tr>
<tr>
<td>The Sustainable Design Checklist is an unnecessary complication and should not be adopted.</td>
</tr>
</tbody>
</table>

**Action:** The checklist has been withdrawn and will not be adopted.
| Sean Bashforth | Quod Planning on behalf of Westfield Shoppingtowns Limited | We note that the SPD is related to the increasingly out of date Guildford Local Plan (2003), rather than the Council’s emerging Core Strategy. In this context it is essential that any policies amplify rather than significantly add to the statutory policy framework. This is particularly important in the context of the pending abolition of the Regional Spatial Strategies.

It is also essential that policy does not unduly duplicate other regulations and requirement such as Buildings Regulations which are particularly relevant in relation to Sustainability and Building Design Standards.

It is also essential that policy does not act as a disincentive to bring forward development and any policy requirement needs to be considered against viability and other requirements, particularly given ongoing challenging economic conditions.

Notwithstanding this position, Westfield generally supports measures to increase sustainability standards and we set out more detailed comments below. |

| Sean Bashforth | Quod Planning on behalf of Westfield Shoppingtowns Limited | **ACTION 1 (COSH Level 4)**

Westfield agree that, on the basis of pending changes to Building Regulations that all residential development now being consented should be capable of achieving Code for Sustainable Homes Level (COSH) 4. At this stage it is inappropriate to require the attainment of higher standards on the basis that achieving the Zero Carbon Home (COSH Level 6) remains relatively untested and has only been achieved for low density demonstration projects, not high density commercial schemes in town centres.

It is noted that the policy potentially allows exceptions (the footnote acknowledges ‘unless otherwise agreed in writing’) and this is welcomed and will allow discussions to include consideration of practical and financial consequences of achieving standards. |

Comments noted. The SPD builds upon the outdated Sustainable Design and Construction SPD which contains policies on energy, water efficiency and design. A key mechanism for delivering these policies is the use of environmental assessments such as the Code for Sustainable Homes and BREEAM. The SPD has been revised to require Code Level 3 as a minimum standard which broadly aligns with Part L of the Building Regulations. The Council has successfully required new homes in the Borough to achieve at least Code Level 3 since May 2008.

Comments noted.
<table>
<thead>
<tr>
<th>Sean Bashforth</th>
<th>Quod Planning on behalf of Westfield Shoppingtowns Limited</th>
<th><strong>ACTION 3 (BREEAM VERY GOOD)</strong></th>
<th>If developers can clearly demonstrate that the requirements would make the development economically unviable or unfeasible, the council may agree in writing to a lower BREEAM standard (e.g. BREEAM Good).</th>
</tr>
</thead>
</table>
| Sean Bashforth | Quod Planning on behalf of Westfield Shoppingtowns Limited | **ACTION 4 (15% CARBON REDUCTIONS)** | Comments noted.  
**Action:**  
LZCT targets for residential developments revised to require a 10% reduction in carbon emissions from residential developments.  
LZCT targets for non-residential developments revised to complement South East Plan Policy NRM 11 by requiring a 10% reduction in carbon emissions for developments of 1,000sqm or more. |
| Sean Bashforth | Quod Planning on behalf of Westfield Shoppingtowns Limited | **ACTION 5 (GREEN NETWORKS)** | Support noted  
**Action:** Graphs and supporting text updated. |
| Shere Parish Council | In general Shere Parish Council supports the content of this document. It does, however, make some specific comments which are set out below. | | Support noted  
**Action:** Graphs and supporting text updated. |
In the introduction (pages 5 and 6) it would be helpful to clarify the units on the graphs relating to Guildford’s environmental footprint and greenhouse gas emission data. Whilst they may simply be indices it should still be made clear whether they are per capita or per dwelling.

Shere Parish Council

In the list of relevant national policy (page 9) it is fair to say that PPS 5 on the Historic Environment should be included. The sustainable use of resources should include the maintenance of the “historic environment” which is a non-renewable resource.

Shere Parish Council

The aim that new dwellings should at least reach Code for Sustainable Homes Level 4 (page 15) is welcome, but does it also refer to replacement dwellings (which would be desirable)?

Shere Parish Council

Although reference is made to “green roofs” in the context of sustainable drainage systems (SuDS), we feel that they should have a higher profile, with a more robust approach to increasing their use. Whilst they do undoubtedly have a significant value from a sustainable drainage aspect, they have a range of other values; wildlife enhancement, energy efficiency, aesthetics and urban air quality.

Shere Parish Council

Where SuDS are installed (page 25) it should be clear that they should be maintained for the benefit of wildlife.

Shere Parish Council

The biodiversity section (page 29) is good in principle, but as it stands it seems to be little more than an aspiration. Routes are needed to ensure that these aspirations are fulfilled. The council notes that the biodiversity Action (page 30) is only an expectation.

Shere Parish Council

In the introduction (pages 5 and 6) it would be helpful to clarify the units on the graphs relating to Guildford’s environmental footprint and greenhouse gas emission data. Whilst they may simply be indices it should still be made clear whether they are per capita or per dwelling.

Comments noted.

No change.

Support noted. The Code for Sustainable Homes requirement (revised to Code Level 3) will apply to replacement dwellings.

Action: additional text inserted in Section D5

Comment noted.

Detailed guidance on SuDS in provided in Annex 3 and from the Environment Agency. Whilst we recognise the wildlife value of certain SuDS infrastructure, we consider it is inappropriate to include such a reference as maintenance may be required that is essential to keep the SuDS system functioning effectively but could have a short term impact upon wildlife.

No change.

We are currently obtaining data to inform our Green Infrastructure evidence which will inform the policies of the emerging Core Strategy.
whereas CSH Level 4 is a requirement.

**Julia Coneybeer**  
Natural England  
Natural England welcomes this SPD setting out how the council will ensure sustainable construction and design is provided, in particular drawing on the predicted effects of climate change, and we agree with the objectives of the SPD as set out as on page 8. This policy will help the borough contribute to addressing climate change at a local level.

**Julia Coneybeer**  
Natural England  
Where possible, measures included in the policy including sustainable drainage measures (paras 5.11 – 5.14) should be incorporated into the GI Strategy currently being developed by the council.

**Julia Coneybeer**  
Natural England  
We are pleased to see recognition of landscape and biodiversity in this SPD (paras 5.22 – 5.27) as part of the Borough’s resources to help it address climate change and that these resources are protected as far as possible. We would also wish to see the SPD seek to secure enhancement/creation as part of sustainable development, which will help contribute to green networks as referred to in para 5.25. This should be strongly linked to the council’s GI Strategy, which will guide the council in achieving a robust GI network across the borough as a whole.

**Julia Coneybeer**  
Natural England  
Natural England is satisfied with the conclusions made in the SEA and HRA screenings for the draft Planning Contributions SPD.

**Jennie Kyte**  
Paragraph 5.4 under the heading ‘Section D: Further Guidance’ is very welcome. Buildings housing many people can be very successfully built using natural ventilation and shutters. However, large supermarkets in Guildford now use very strong air-conditioning throughout the year and are very cold places to shop.

**Section D5 has been revised in the final document.** However, paragraph 5.22 of the consultation document (and updated document) states that ‘developers will be required to submit a site survey to determine whether designated sites, UK and Surrey Biodiversity Action Plan (BAP) habitats….**

Support noted

We are currently defining our typology for Green Infrastructure and we will take this recommendation into account.

Comments noted.  
No change.

HRA soundness noted.  
No change.

Comments noted.  
We agree that air conditioning systems can use significant amounts of energy. It is for this reason that we encourage new build or refurbishment of non-residential buildings to maximise opportunities for natural ventilation.
in. It would be interesting to know how much their energy consumption has increased over the years.

Large department stores, such as Debenhams, which have installed air conditioning, whereas natural ventilation used to suffice, could be encouraged to use it sparingly, except in very hot weather.

However, I notice that since the recession air conditioning has been used more sparingly, and it is also reported that the energy consumption of the country has gone down in the recession.

In addition, many high street retailers and small store owners have realised the efficiency savings that can be made by reducing heating and cooling usage.

<table>
<thead>
<tr>
<th>Simon Banks Environment Agency</th>
<th>Action 1</th>
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<tbody>
<tr>
<td>We support the requirement to require residential developments of 1 or more gross units to achieve as a minimum Code for Sustainable Homes Level 4. This will ensure a water efficiency standard of at least 105 litres/head/day (l/h/d), which is particularly important as the South East of England is an area of ‘serious’ water stress.</td>
<td>Support noted. Code for sustainable homes requirement revised to Code Level 3 as a minimum however this will still require a water efficiency standard of at least 105 litres/head/day (l/h/d)</td>
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<table>
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<tr>
<th>Simon Banks Environment Agency</th>
<th>Action 2</th>
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<tbody>
<tr>
<td>We support the commitment to improving the quality and design of housing and neighbourhoods through Building for Life. We would encourage the Council to emphasise the role that protection and enhancement of the environment can assist in this regard.</td>
<td>Comments noted. No change.</td>
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<tr>
<th>Simon Banks Environment Agency</th>
<th>Action 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>We would encourage the Council to consider requiring non residential developments of 1000 sqm or more (net) floorspace to achieve a BREEAM Excellent assessment rating as a minimum. We also recommend the Council to require non residential development to achieve a maximum number of ‘water credits’, as it is possible to achieve a BREEAM Excellent rating without incorporating water saving measures. Water credits should be assessed in accordance with the requirements of the relevant BREEAM scheme, with the exception of credits awarded for greywater/rainwater systems. These systems...</td>
<td>We considered requiring BREEAM Excellent as a minimum, however the step change between BREEAM Very Good and Excellent is significant (specifically in cost terms), therefore due to the current economic conditions affecting the property market we consider BREEAM Very Good is an appropriate requirement to ensure that new build developments are designed to high levels of sustainability, whilst at the same time enabling development to go ahead. We will review sustainable design and...</td>
</tr>
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</table>
should only be installed where cost effective and the system is designed to ensure that energy use and carbon emissions are minimised. Alternatively buildings could meet the ‘best practice’ level of the AECB (Association for Environment Conscious Building) Water Standards.

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<thead>
<tr>
<th>Simon Banks</th>
<th>Environment Agency</th>
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<tbody>
<tr>
<td><strong>Action 4</strong></td>
<td>We support the commitment to reducing the impacts of new development on the causes of climate change by requiring a reduction in carbon emissions. We welcome the comprehensive discussion of water issues, including flood risk, set out under Section D2 of the Draft SPD. In particular, we are pleased to see the integration of Sustainable Drainage Systems (SUDS) into the Council’s approach to Sustainable Design and Construction. We support the links to the Guildford Flood Risk Reduction Measures document, and the references to partnership working.</td>
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<tr>
<th>Simon Banks</th>
<th>Environment Agency</th>
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<tbody>
<tr>
<td><strong>Action 5</strong></td>
<td>We support the requirement for developers to incorporate green networks and suitable tree species into their development proposals to mitigate the impacts of climate change and enhance biodiversity. We would encourage the Council to recognise the importance that river corridors play in the Draft SPD, and specifically require that they should be protected at all times and enhanced where appropriate. As a general point regarding the above actions, where the actions state ‘unless agreed in writing by the Council’, we would encourage the Council to utilise this clause rarely, and only when an applicant has demonstrated that exceptional circumstances exist which mean that compliance with the Actions is not appropriate. Support noted.</td>
</tr>
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</table>

Support noted.
<p>| Simon Banks | Environment Agency | <strong>Annex 3</strong> | We are thrilled to see practical guidance on the use of SUDS included in the Draft SPD. As a source of additional technical guidance, we recommend that you include a reference to the following page on our website: <a href="http://www.environment-agency.gov.uk/business/sectors/36998.aspx">http://www.environment-agency.gov.uk/business/sectors/36998.aspx</a>. |
| Simon Banks | Environment Agency | <strong>Action: reference to website inserted in Annex 3</strong> |
| Guildford Environmental Forum | | <strong>With regard to our statutory role as an environmental consultee under the SEA Directive, we are satisfied that with the Council’s assessment of the Planning Brief in terms of Strategic Environmental Assessment (SEA) Screening. We concur that the Draft SPD would not be “likely to have significant environmental effects”, and therefore does not require an SEA.</strong> |
| Guildford Environmental Forum | | <strong>Satisfaction noted</strong> |
| Guildford Environmental Forum | | <strong>In general the Forum supports the content of this document, but feels that it is not sufficiently ambitious, especially as other local planning authorities have gone notably further. The document reads as too much of a basic guide to building regulations and national guidance and not enough on what standards Guildford is going to lay down. We face serious threats to our energy and food security at a time when many international agencies and corporations are agreeing that Peak Oil is upon us. The SPD does not reflect these realities.</strong> |
| Guildford Environmental Forum | | <strong>The Council is committed to tackling climate change and the consultation document required new build developments to achieve at least Code Level 4 ahead of the national timetable. In light of the comments received during the consultation period we have revised our targets to level 3 as a minimum to enable development to proceed during the current period of low economic growth which has impacted development viability across the country. The emerging Core Strategy will review the sustainable design and construction standards set out in this SPD.</strong> |
| Guildford Environmental Forum | | <strong>When addressing the question of sites where it may not be viable for the development to meet all the demands made of it (page 4), it may be useful to set out in the document the priorities between the various demands that would normally be made. An additional possibility is that if a development cannot afford to meet the environmental standards set it could contribute to a fund which looks at retrofitting existing properties to reduce the carbon foot print of the existing housing stock.</strong> |
| Guildford Environmental Forum | | <strong>The government is due to announce the definition of Zero Carbon Homes and define what developers can provide as allowable solutions to achieve zero carbon homes by 2016. We will explore the use of a carbon off-set fund (or a similar form fund) through the emerging Core Strategy policies in due course. However, at the present time we</strong> |</p>
<table>
<thead>
<tr>
<th>Guildford Environmental Forum</th>
<th>In the introduction (pages 5 and 6) it would be helpful to clarify the units on the graphs relating to Guildford’s environmental footprint and green house gas emission data. Whilst they may simply be indices it should still be made clear whether they are per capita or per dwelling.</th>
<th>consider such a requirement is premature in light of the lack of guidance and definitions.</th>
<th>Action: graphs and supporting text updated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Environmental Forum</td>
<td>In the list of relevant national policy (page 9) it is fair to say that PPS 5 on the Historic Environment should be included. The sustainable use of resources should include the maintenance of the “historic environment” which is a non-renewable resource.</td>
<td>Comments noted</td>
<td>No change</td>
</tr>
<tr>
<td>Guildford Environmental Forum</td>
<td>The aim that new dwellings should at least reach Code for Sustainable Homes Level 4 (page 15) is too low a standard, and it may be useful to include explicitly any future upgrade in the levels required by the Code. It may also be desirable to set priorities for individual elements (for example, achieving maximum credits for energy or water), alternatively Guildford could adopt Code Level 6 for energy and water and Code Level 4 for everything else. This is what businesses are able to deliver. Does the requirement also refer to replacement dwellings (which would be desirable)?</td>
<td>The Council is committed to tackling climate change and the consultation document required new build developments to achieve at least Code Level 4 ahead of the national timetable. In light of the comments during this consultation we have revised the requirement to level 3 as a minimum to enable development to proceed during the economic down turn which has impacted development viability across the country. In addition, these standards broadly align with the recently revised building standards which will provide both certainty and consistency for developers. The emerging Core Strategy will review the sustainable design and construction standards set out in this SPD which will be informed by a detailed evidence base.</td>
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<tr>
<td>Guildford Environmental Forum</td>
<td>Action 4 (page 21) needs clarification as to the baseline for the 10/15% reduction, does it cover regulated only or does it include unregulated energy as well?</td>
<td>The calculations are based on the Building Regulation Dwelling Emission Rate (DER) which measures CO2 emissions per m2 per year (KgCO2/m2/year) for the dwelling as designed. It accounts for energy used in heating, fixed cooling, hot water and lighting.</td>
<td>Action: additional text inserted in Section D5</td>
</tr>
<tr>
<td>Guildford Environmental Forum</td>
<td>Although reference is made to “green roofs” in the context of sustainable drainage systems (SuDS), we feel that they should have a higher profile, with a more robust approach to increasing their use. Whilst they do undoubtedly have a significant value from a</td>
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<tr>
<td>Guildford Environmental Forum</td>
<td>Sustainable drainage aspect, they have a range of other values; wildlife enhancement, energy efficiency, aesthetics and urban air quality.</td>
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<td>Where SuDS are installed (page 25) it should be clear that they should be maintained for the benefit of wildlife.</td>
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<td>Guildford Environmental Forum</td>
<td>The biodiversity section (page 29) is good in principle, but as it stands it seems to be little more than an aspiration. Routes are needed to ensure that these aspirations are fulfilled. The Forum notes that the biodiversity Action (page 30) is only an expectation, whereas CSH Level 4 is a requirement.</td>
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<tr>
<td>R.J. Bromham Holy Trinity Amenity Group</td>
<td><strong>General comment:</strong> At 44 pages this is again too long for a definitive planning policy document. It is an excellent comprehensive survey of the subject, but not easy to use for either developers or third parties, such as ourselves, in relation to planning applications. We hope that the enforceable requirements, and the recommendations, can be gathered together in the first section, or preferably in a separate concise document, with the supporting information clearly presented as such.</td>
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<tr>
<td>R.J. Bromham Holy Trinity Amenity Group</td>
<td>Paragraph 1.12. Other factors contributing to Guildford’s excessive “Environmental Footprint” are the hostile environment for pedestrians and cyclists and the failure to adequately promote use</td>
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</table>

Comment noted. Detailed guidance on SuDS in provided in the Annex and from the Environment Agency. Whilst we recognise the wildlife value of certain SuDS infrastructure, we consider it is inappropriate to include such a reference as maintenance may be required that is essential to keep the SuDS system functioning effectively but could have a short term impact upon wildlife. No change.

The biodiversity Action has been removed and the proceeding guidance revised to provide greater clarity. It is important to note that the Code for Sustainable Homes and BREEAM assessments contain categories concerning ecological value and enhancement. No change.

Whilst we recognise that the document may appear to be long and detailed, it is important that we provide sufficient supporting information to justify the requirements set out in the document. It is important to note that the document has been structured so that information is easy to find and the document is much shorter than the Sustainable Development and Construction SPD it replaces.

Comment noted. No change.
<table>
<thead>
<tr>
<th>R.J. Bromham</th>
<th>Holy Trinity Amenity Group</th>
<th><strong>Paragraph 1.13.</strong> It would help if the basis for the footprint was given, i.e. per resident, dwelling, or urban hectare?</th>
<th><strong>Action:</strong> Graphs and supporting text updated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>R.J. Bromham</td>
<td>Holy Trinity Amenity Group</td>
<td><strong>Objectives.</strong> For new town centre commercial developments the relative sustainability benefits of obtaining contributions towards public transport, rather than Park and Ride, should be considered.</td>
<td>The Planning Contributions SPD (2011) sets out the types of planning contributions that may be required from developments in the Borough, including park and ride. We do not consider there is a need to duplicate the content of this document. No change.</td>
</tr>
<tr>
<td>R.J. Bromham</td>
<td>Holy Trinity Amenity Group</td>
<td><strong>ACTION 1.</strong> Very large houses, some of which are mansions of 750 sqm floorspace or more, continue to be built in Guildford. The environmental footprint of these dwellings will be many times more than those of typical modest houses of around 130 sqm. While it may not be possible to apply the same limit to the footprint size for all dwellings it would be reasonable, and more equitable, to impose tighter restrictions on larger houses. We hope this issue can be addressed by planning policy.</td>
<td>Comment noted. Building regulations set the minimum performance standard for new build developments and Level 3 of the Code for Sustainable Homes is broadly in line with these standards. At present there is no planning policy basis to require larger dwellings to achieve higher sustainability standards. In developing the Core Strategy design and construction policies we will need to produce a robust and credible evidence base and we will consider a range of options that satisfy planning policy and legislation to deliver low and zero carbon homes in the Borough.</td>
</tr>
<tr>
<td>R.J. Bromham</td>
<td>Holy Trinity Amenity Group</td>
<td><strong>ACTION 2.</strong> We believe requirements on developers should be universal, rather than only be applied to developments above a certain size. Experience with provision of affordable housing shows that Developers will evade such requirements by splitting developments into small parts that do not then come within the requirement. <strong>ACTION 3.</strong> Comment as for Action 2. Further, the threshold of 1000sqm appears high – this would be a substantial commercial development.</td>
<td>The text of action 2 has been revised. We encourage developers of major schemes (10 dwellings or more) to demonstrate that their scheme will achieve at least a good Building for Life standard. Building for life is not a mandatory standard. Major schemes were selected as the trigger as we consider that such a process could prove onerous for minor developments (for example, it would be unreasonable have detailed discussions on this issues for a replacement dwelling.</td>
</tr>
</tbody>
</table>
**ACTION 4.** Comment as for Action 2.  

Major schemes were also selected as it is these types of schemes that usually trigger S106 requirements and therefore require significant engagement between the applicants and planning officers from the outset. We will explore revising the BfL requirements through the emerging Core Strategy.

<table>
<thead>
<tr>
<th>R.J. Bromham</th>
<th>Holy Trinity Amenity Group</th>
<th>Paragraph 5.2. Reduce the need for energy.</th>
<th>The obvious measure is to minimise the size of the building; this should at least be mentioned, as should the benefit of producing a compact building with the minimum external surface area. Heating design temperatures for bedrooms, corridors etc. should be minimised. New retail development should have open streets and not energy consuming enclosed malls.</th>
</tr>
</thead>
<tbody>
<tr>
<td>R.J. Bromham</td>
<td>Holy Trinity Amenity Group</td>
<td>Paragraph 5.4. We fully support the objective of avoiding air conditioning. This objective could be strengthened by making a presumption against reliance on air conditioning in certain types of developments, such as retail and restaurants.</td>
<td></td>
</tr>
<tr>
<td>R.J. Bromham</td>
<td>Holy Trinity Amenity Group</td>
<td>Paragraph 5.28.</td>
<td>Suggest reword the last clause thus &quot;to maximise the potential for the public to travel by such modes (walking and cycling)&quot;. This would avoid the problems of the St. Luke’s estate where it has been claimed that paths provided were only intended for use by residents of the estate – despite the fact that they should have been part of important through routes.</td>
</tr>
</tbody>
</table>

Building Regulations set out the requirements for thermal and energy efficiency of new build developments.

Comment Noted. No change