

ENERGY AND NEW DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT

STATEMENT OF CONSULTATION

1. INTRODUCTION

- 1.1 The Energy and New Development Supplementary Planning Document (SPD) has been prepared to expand upon and clarify existing Unitary Development Plan (UDP) policies in respect of the matters of energy efficiency and sustainable energy sources appertaining to new developments. It will outline how the Council will expect new developments to introduce energy efficiency measures and reduce their predicted carbon dioxide emissions through the use of on-site renewable technologies, in order to comply with national guidance, particularly as expressed in Planning Policy Statement: Planning and Climate Change. It will also give guidance to developers, planners and other stakeholders in respect of the technologies available. It will provide a body of policy and practical guidance and good practice for the areas of energy efficiency and renewable technologies in new developments.
- 1.2 In order to ensure that appropriate public consultation takes place, SPDs are required to be accompanied by a statement setting out how the Local Planning Authority will comply with the Council's Statement of Community Involvement (SCI). This document details the public consultation that will take place to meet these requirements.
- 1.3 The new planning system introduced during 2004 includes new requirements (e.g. community involvement and the need to undertake a Sustainability Appraisal) governing the preparation of SPDs which replace the old style Supplementary Planning Guidance documents (SPG). Whilst not having 'development plan' status, SPDs will be afforded greater weight in the development control process than SPGs.
- 1.4 This document sets out the public participation procedures to be undertaken by the Council for the Energy and New Development SPD. It accords with regulation 17 of the Town and Country Planning (Local Development) (England regulations 2004).
- 1.5 Using the guidelines of the new government regulations and PPS 12, the final draft SPD has been prepared through a process of consultation.

2. CONSULTATION CARRIED OUT TO DATE

2.1 Early consultation

Early consultation was carried out to engage with relevant stakeholders about the scope, purpose and content of the document. This included:

- A large number of stakeholders, including all Council Members, many Council Officers, national and local housebuilders, and interest and community groups, as well as other Local Authorities, were sent background papers outlining the main issues and asking a series of questions in respect of the scope and content of the proposed document. Along with this document was an invitation to attend a consultation event in the Town Hall on 8th August 2007.
- The consultation event was held, and was attended by 27 stakeholders, including six Members of the Council, community groups, Rochdale Boroughwide Housing, Rochdale Development Agency, other authorities and developers. A further 23 stakeholders registered that they were unable to attend but would like to be kept informed of the progress of the document.
- The event consisted of an introduction and planning background, a presentation on the scope of the proposed document with the national context, and a speaker from Oldham MBC outlining that Authority's experience of implementing a similar document to the one proposed, followed by workshop sessions where a number of questions pertaining to the scope and content of the proposed document were

discussed in detail. In particular, policy options for energy efficiency and conservation and policy options for on-site renewable technologies in new developments were discussed. These discussions were useful, there was consensus on a number of issues and more heated debate on others.

These activities helped to shape the content and scope of the draft SPD.

2.2 The Sustainability Appraisal (SA) process

The first part of the SA process involved collecting background information for inclusion in the Scoping Report which enabled the scope of the SA to be determined. It was also a consultation document which allowed organisations and individuals to comment on the proposed scope of the SA. Consultation responses received helped to ensure that the draft SA was comprehensive and robust enough to support the SPD during later stages of full public consultation and examination.

Paper copies of the draft Scoping Report were sent out on the 10th August 2007 and recipients given a period of five weeks, until 14th September, to make comments. Government requires that three specific bodies (as required by the Strategic Environmental Assessment Directive) were consulted at this stage – Natural England, English Heritage and the Environment Agency. Although not statutorily required, the following bodies were also consulted:

- Government Office for the North West
- The North West Regional Assembly
- Greater Manchester Ecology Unit
- Greater Manchester Chamber of Commerce
- Rochdale Civic Society
- Rochdale Local Strategic Partnership
- Home Builders Federation

Consultation responses have been received, recorded and incorporated into the Scoping Report as required. A draft SA has been completed for this SPD and was subject to public consultation as part of the SPD consultation exercise between 19th March and 23rd April 2008.

2.3 PUBLIC CONSULTATION

In accordance with the Council's Statement of Community Involvement, public consultation included direct notification to consultees, key local stakeholders and other interested parties. Publicity was also be provided through the local press.

On publication of the draft SPD a public consultation exercise was undertaken to raise awareness and interest. In accordance with Regulation 17, a public notice was published in all three local newspapers which clearly stated the duration of the public consultation period and the places and times at which the SPD could be inspected.

Public consultation commenced on Wednesday 19th March and ended on Wednesday 23rd April. The following consultation methods were used:

- The draft SPD was available on the Council's website Rochdale.gov.uk/council and democracy/consultations.aspx . Comments could be made online;
- Hard copies of documents were available for inspection at Council offices, libraries and community centres as detailed in Appendix 1;
- Letters were sent to all parties Rochdale Council considers to have an interest in the SPD including statutory consultees, general consultees, developers, interest groups and community interests. The letter included details of the role of the SPD and how and where to view the draft SPD and associated documents including the draft SA and make comment;

- A public notice was placed in the Rochdale Observer, Heywood Advertiser and Middleton Guardian newspapers.
- Paper or electronic copies of the SPD or associated documents were available on request (see contact details below).
- Those who wished to view this in large print or in Braille or for translation into Bengali or Urdu were able to contact the office below to arrange this.

The consultation exercise ended on 23rd April 2008. A total of 22 responses were received, from a diverse range of bodies. The schedule of responses is included as Appendix 2 in this document. There were a number of objections relating to the principle of the document and the proposed requirements from developers. The objections in principle related to the following:

- there was concern over the role of planning in energy efficiency matters, given that Building Regulations is already involved in this area.
- There was concern that the technologies are not yet widely available to meet the requirements.
- There was concern that the requirements went beyond what the local authority is justified in asking for.

Other comments related to the layout and content of the guidance. There was also a large degree of support for the document from a number of bodies.

The responses in respect of all comments received are outlined in Appendix 2. Some changes have been made to the document as a result of comments received, notably changing the timetable for carbon reductions slightly and clarifying the types of development to which the requirements would apply.

A few comments were also received in relation to the European Protected Sites Screening Opinion, and this matter has been referred to Greater Manchester Ecology Unit for comment.

3. ADVICE AND ASSISTANCE

For further advice or information relating to this document please contact:

Strategic Planning Team
Planning and Regulation Service
Rochdale Metropolitan Borough Council
PO Box 32
Telegraph House
Baillie Street
Rochdale
OL16 1JH

Telephone: 01706 924371

Email: strategic.planning@rochdale.gov.uk

Website: [www.rochdale.gov.uk/council and democracy/consultations.aspx](http://www.rochdale.gov.uk/council_and_democracy/consultations.aspx)

APPENDIX 1

Venues for public inspection of Energy and New Development SPD (subject to normal opening hours)

Council Information Points:

Planning and Regulation Reception, Floor 1, Telegraph House, Rochdale
Rochdale Information Centre, Floor 2, Municipal Offices, Smith Street, Rochdale
Heywood Information Centre, 44-46 Market Street, Heywood
Middleton Information Centre, Sadler Street, Middleton
Milnrow Information centre, 82 Dale Street, Milnrow

Libraries

Wheatsheaf Library, Baillie Street, Rochdale
Balderstone Library, Balderstone Park, Rochdale
Belfield Library, Belfield Community School, Samson Street, Rochdale
Castleton Library, 881 Manchester Road, Rochdale
Smallbridge Library, Stevenson Square, Rochdale
Spotland Library, Ings Lane, Rochdale

Heywood Library, Church Street, Heywood
Darnhill Library, Argyle Parade, Heywood
Norden Library, Edenfield Road, Rochdale

Middleton Library, Long Street, Middleton
Alkington Library, Kirkway
Langley Library, Windermere Road, Middleton

Littleborough Library, Hare Hill Park, Littleborough
Milnrow Library, Newhey Road, Milnrow
Smithybridge Library, 121/3 Smithybridge Road, Littleborough
Wardle Library, 448 Bh Road, Wardle, Rochdale

Appendix 2: Schedule of comments received and responses to them, with proposed changes to the document

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
1.	Yorkshire and Humber Assembly	<ul style="list-style-type: none"> No comments 		<ul style="list-style-type: none"> No change required
2.	English Heritage	<ul style="list-style-type: none"> No comments 		<ul style="list-style-type: none"> No change required
3.	North West Regional Assembly	<ul style="list-style-type: none"> No comments 		<ul style="list-style-type: none"> No change required
4.	Environment Agency	<p>Supports the proposed SPD.</p> <ul style="list-style-type: none"> The Code for Sustainable Homes has minimum standards for water efficiency; we would therefore expect the relevant part of the document to have a chapter relating to water efficiency. The SPD should also promote the use of Sustainable Urban Drainage Systems (SUDs). Land Drainage Consent is only required for works within 8 metres of a main river not 9 as stated in the SPD. 	<ul style="list-style-type: none"> The purpose of the document is to provide guidance in terms of the specific areas of energy efficiency and renewable energy installations. Guidance relating to water efficiency is contained with the Oldham and Rochdale Urban Design Guide SPD. As above, the Council promotes SUDs through the provisions of the Urban Design Guide. The guidance should be amended to reflect this comment. 	<ul style="list-style-type: none"> No change to be made No change to be made Paragraph 6.4.2 to be amended to refer to an 8 metre distance rather than 9.
5.	Barry Simons, Sustainability Manager	<ul style="list-style-type: none"> Suggests a number of changes to the wording of the document to make it more accurate and informative Will the requirements relate to refurbishments and change of use that require planning permission as well? Suggests that language should be strengthened to indicate requirements are a bare minimum and wording indicate a link 	<ul style="list-style-type: none"> Document to be amended to reflect suggested changes. It is assumed that the requirements also relate to refurbishments and changes of use, however it is agreed that this should be made more explicit in the document. It is agreed that wording should be introduced to make a link with 	<ul style="list-style-type: none"> No change required Amend document to refer to refurbishments and changes of use that require planning permission and which exceed the thresholds of 5 or more dwellings or non-domestic development of more than 500 square metres Amend document to include

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<p>with regional and national policy and best practice.</p> <ul style="list-style-type: none"> • Is uncomfortable with this entire section 4 being included in any publically accessible draft document. To me and therefore more than likely any potential applicants or developers reading this it makes it abundantly clear that Rochdale MBC's DC Officers are themselves, as a group in need of guidance on the scope of this SPD. Bearing in mind DC will be responsible for applying and enforcing the "policy" I don't think that it is appropriate or in our interest to publicise this. This DC section as it's currently written should therefore be removed. This section can be printed off and distributed to DC internally. It should, at any rate form the subject matter of an internal technical briefing given by spatial planning to DC. I would strongly suggest that specialist training e.g. by BRE is delivered well before this SPD is adopted, Paul Thistlethwaite at BRE is the man to contact. 	<p>regional and national policy and best practice, so that the Rochdale 'approach' does not fall behind.</p> <ul style="list-style-type: none"> • It is agreed that guidance to planners may affect confidence in the ability of the Council to deal with these matters. 	<p>wording relating requirements to regional and national policy and best practice</p> <ul style="list-style-type: none"> • Guidance to planners to be printed and distributed separately.
6.	Highways Agency	<ul style="list-style-type: none"> • Satisfied with the content of the document and do not wish to suggest any changes. 		<ul style="list-style-type: none"> • No change required
7.	CABE	<ul style="list-style-type: none"> • No specific comments 		<ul style="list-style-type: none"> • No change required
8.	Northwest Regional Development Agency	<p>Welcomes the draft document. It provides helpful guidance and sets clear targets. It will therefore contribute to the objectives and targets set out in '<i>Rising to the Challenge</i>', the region's climate change action plan. Comments:</p>	<ul style="list-style-type: none"> • In view of this development it would of course be appropriate to amend the document accordingly • It appears that the inconsistency between the NWDA proposed 	<ul style="list-style-type: none"> • Reference to the Sustainability Standard to be moved out of the 'in preparation' section • Amend targets to refer to 2014 and 2017 in line with the NWDA

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		<ul style="list-style-type: none"> • The reference to the NWDA's Sustainability Standard appears under the sub-heading 'In Preparation', which is inaccurate as it has been formally approved by the Agency's Board. Suggest alternative wording to describe the Standard. • We are pleased to note that the carbon reduction standards for non-residential development closely reflect the NWDA's Sustainability Standard. However, the Draft SPD brings forward its targets for 2014 and 2017 to 2013 and 2016 respectively. We consider the targets in our Sustainability Standard to be both ambitious and challenging and see no valid reason for bringing them forward. For consistency, we therefore suggest that the Draft SPD's targets are amended to read: From 2014 44% reduction in CO2 emissions From 2017 79% reduction in CO2 emissions • Our final comment relates to the contribution, within these targets, from the provision of on-site or decentralised sources or renewable or low carbon energy. Instead of imposing a 20% requirement from 2011 onwards, we feel it may be more realistic and appropriate to gradually step up this requirement in line with the increasing CO2 reduction targets. We suggest that the contribution from renewable / low carbon energy sources could be set at 10% from 	<p>timescales and those in the draft document result from the SPD making the assumption that the NWDA's target periods were exclusive rather than inclusive (thus, for example, their target periods of 2011-13 and 2014-16 translated as 2013 and 2016). It is agreed that targets should be consistent with those of the NWDA.</p>	<p>targets.</p>

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		2011; 15% from 2014 and 20% from 2017.		
9.	Beva Group	<ul style="list-style-type: none"> We would urge you to look at what is possible and not what is aspirational. We are having awful problems with other authorities who cannot advise us on how we can achieve what is in their policies. A vision of where we would like to get to and what we would like to achieve over a period of time when the technology is available to achieve it would be better than having a policy that ties everyone down to impossible targets. We feel that for large industrial premises there is as yet no technology for renewal large and efficient enough to generate the capacity we would require. We feel that rather than tinker around the edges trying to produce 1.5 KW by purchasing expensive forms of small generation, we would be much better off subsidising the power generators to produce more “green” electricity. They are the only ones who will be able to make any impact in clean generation efficiently. With regard to biomass we are aware that companies and authorities who have already changed to biomass boilers are in fact, because biomass has increased in price threefold, now importing their biomass from Canada. Have you a policy or a mechanism to deal with the matter if the 10% requirement is 	<ul style="list-style-type: none"> The substance of this point is that the technology to achieve the required targets is not currently available. However, the expert opinion of our consultants is that this is incorrect, and indeed that developers will have little difficulty in obtaining the relevant technology. <ul style="list-style-type: none"> See first point above The gist of national and regional guidance, including PPS22 and existing and proposed Regional Spatial Strategies, is that local planning authorities should have policies requiring a percentage of the energy used in new developments to come from on-site renewable energy technologies. Clearly it would be desirable for the biomass to be locally produced. Technologies such as this are clearly reliant upon their operators to maximise their benefit in energy reduction terms, but are still seen as potentially low carbon sources of energy to be encouraged. There may be very exceptional circumstances where the requirement cannot be achieved. Alternatives such as contributions to other schemes may be considered in these circumstances. Additionally, the document could indicate that developments which show an exceptional degree of excellence in energy-saving design and other 	<ul style="list-style-type: none"> No changes to be made No changes to be made No changes to be made No changes to be made The document will indicate that developments which show an exceptional degree of excellence in energy-saving design and other measures may not have to meet the full requirements in respect of on-site renewables. No changes to be made No changes to be made No changes to be made Document to be amended to cover refurbishments and changes of use where planning permission is required and which exceed the thresholds or 5 or more dwellings or non-domestic development of more than 500 square metres No changes to be made No changes to be made

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<p>not achieved or cannot be achieved?</p> <ul style="list-style-type: none"> • Have you thought of a solution that if the requirements of this policy make a development financially unviable. • We are currently dealing with various authorities who are further down the road with this planning matter and they are all having difficulties with commercial buildings. If you are not careful commercial development and job creation could quickly grind to a halt as there are no current solutions to the requirements in these documents. • There would be a much better use of resources to go back to older commercial building and bring them up to modern levels of energy use rather than attempt to achieve something which is not currently possible. • We do not feel that the planning system is the way forward to achieve lower carbon emissions. Planning is a land use matter and should remain so, technical aspects of energy use should be left to technical experts. • There is no mention of nuclear electricity generation which is carbon neutral. The government can achieve all its carbon emission targets by building new nuclear generation facilities. 	<p>measures may not have to meet the full requirements in respect of on-site renewables.</p> <ul style="list-style-type: none"> • It is not implicitly the role of planning to ensure that developments are financially viable. However, expert advice suggests that the requirements in the SPD are not generally prohibitive to new developments. • As previously stated, this document has been developed in close consultation with expert consultants with considerable experience in these matters. Their advice is that new commercial developments should have little difficulty in meeting the requirements. • It is acknowledged that the upgrading of existing building stock is very significant in terms of reducing CO2 emissions and tackling climate change. However, this is something that generally falls outside the remit of planning authorities. However, this document will be amended to ensure that refurbishments and changes of use that require planning permission are brought under the requirements. • Government advice is explicit in respect of the role of planning in tackling carbon emissions. This is reflected in guidance such as PPS22 and in the RSS. • The debate in respect of nuclear power is outside of the remit of this document. 	
10.	Home Builders	<ul style="list-style-type: none"> • Paragraph 1.8 of PPS12 makes it clear that 	<ul style="list-style-type: none"> • The RSS is clear that local authorities 	<ul style="list-style-type: none"> • No changes to be made

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	Federation Ltd	<p>planning policies should not seek to duplicate or cut across matters more appropriately within the scope of other legislative regimes. Energy efficiency in building use and construction is manifestly the responsibility of the building regulations. The result of a recent review of Part L is that all new homes built after April 2006 will be 40% more energy efficient than new homes built in 2002. That is a massive and extremely rapid improvement in performance and new homes are now many tens of times more energy efficient than the existing stock.</p> <ul style="list-style-type: none"> • There must come a point at which, if we are to make real efficiency gains, more attention is diverted to the real culprit, namely the existing stock, rather than constantly going for the easy option of further restrictions on new building. • These requirements are making new homes ever more expensive at a time when affordability is a very serious concern and also at a time when these features are still not wanted by consumers. Efforts should be focussed on changing public perception of the issue if this is not to be a very costly mistake. • It is worrying to find that through the wording of this draft policy that we are not working to a single set of policy objectives. Rather, that each council is proposing to set their own targets which may be less 	<p>should prepare documents, including SPDs, that ensure more innovative design incorporating more efficient use of energy and materials and more eco-friendly and adaptable buildings. Targets in respect of energy efficiency correspond with those suggested in the proposed RSS.</p> <ul style="list-style-type: none"> • It is acknowledged that the upgrading of existing building stock is very significant in terms of reducing CO2 emissions and tackling climate change. However, this is something that generally falls outside the remit of planning authorities. However, this document will be amended to ensure that refurbishments and changes of use that require planning permission are brought under the requirements. • It is clear from guidance that planning authorities are expected to introduce targets in respect of on-site renewable technologies, in response to the perception that climate change is an extremely serious issue which needs to be addressed urgently. • National and regional guidance, rightly or wrongly, leaves the setting of targets in respect of energy efficiency to the local level. However, Rochdale's proposed targets are in line with the forthcoming RSS and they will also be in line with the 'routemap' of the NWDA's Sustainability Standard. Expert advice has been taken to ensure that Rochdale's targets are not 	<ul style="list-style-type: none"> • Document to be amended to cover refurbishments and changes of use where planning permission is required and which exceed the thresholds or 5 or more dwellings or non-domestic development of more than 500 square metres • No change to be made • No changes to be made • No changes to be made • No changes to be made

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		<p>well defined or clear and with less understanding of the implications of those targets. The housebuilding industry simply cannot operate effectively in a climate whereby each individual council has their own increasingly onerous and poorly justified policy. We are already seeing a situation develop whereby individual authorities and regions are seeking to out-do other authorities and/or regions by seeking to develop the most onerous targets.</p> <ul style="list-style-type: none"> • Having a plethora of different targets and policies in operation can only be counter-productive, not only to achieving the overall carbon reduction targets, but also to the need to deliver a substantial step-change in housing supply in the North West region. If the Government is to achieve its house building targets and work towards the delivery of 240,000 new dwellings per year to 2016 and 3 million by 2020 (250,000 higher than the previous target) then it must set in place a level policy playing field nationally. • If the Code for Sustainable Homes is to have any value then it must be rolled out on a consistent basis nationally. If individual authorities are allowed to establish their own interpretations of, or alternatives to the Code, the Code itself will serve no purpose. 	<p>unreasonable in their expectations.</p> <ul style="list-style-type: none"> • Sustainable development is the core principle underpinning planning. Planning authorities are required to balance the social, economic and environmental strands of sustainable development in accordance with national and regional guidance, and this includes setting targets for energy efficiency as well as for housing developments. • As with renewable energy targets, energy efficiency targets are expected to be set at a local level. The targets outlined in the SPD are in line with those in the proposed RSS, which are not proposed to be altered when the RSS is finalised. 	

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11.	Lancashire County Council	<ul style="list-style-type: none"> The document will require updating to take account of the national and regional policy context – for example The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2008 and the publication of the Secretary of State’s Proposed Changes to the draft Regional Spatial Strategy for the North West of England. 	<ul style="list-style-type: none"> The document should be amended to make reference to any relevant policy documents. 	<ul style="list-style-type: none"> Document to be amended to make reference to the documents indicated
12.	Natural England	<ul style="list-style-type: none"> We welcome the intention through this SPD to secure reduction in CO2 emissions in new development. We note that you intend to give consideration to our environmental interests in the determination of planning applications where renewable technologies will be provided. <p>Comments in respect of the Habitats Regulation Assessment Screening Report:</p> <ul style="list-style-type: none"> The introduction does not fully explain the purpose and objectives of the SPD. A more detailed summary of the SPD would be useful so that the screening report can be clearly understood as a stand alone document. The screening report would benefit from the inclusion of maps, one showing Rochdale Borough, a second showing the location of the SPD coverage and a third showing the designated sites in relation to the SPD. Some more detail in respect of European sites would be useful. It is our opinion that the possible impacts of the 	<ul style="list-style-type: none"> Comments noted The comments in respect of the Screening Report will be passed to the Greater Manchester Ecological Unit so that they can review the report accordingly. 	<ul style="list-style-type: none"> No changes to be made Comments to be passed to GMEU for review of screening opinion to take place

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		<p>SPD upon European sites have not been fully addressed.</p> <ul style="list-style-type: none"> We found the final paragraph in section 4.2 quite confusing. It is our opinion that this assessment should address the potential impacts of this plan alone. We are of the opinion that the consideration of in-combination effects has not been addressed in the report. The conclusions should be explicitly worded in terms of the specific tests of the Habitat Regulations. 		
13.	Oldham / Rochdale HMR Pathfinder	<ul style="list-style-type: none"> The development of an SPD that encourages and provides detailed guidance on these matters is welcomed. However, a fundamental concern is that the purpose of the SPD in relation to the Code for Sustainable Homes is unclear. The document requires mandatory standards within the Code for Sustainable Homes and BREEAM Very Good. These include indicators which go beyond energy efficiency and renewable energy and it therefore seems inappropriate to use this SPD to establish these mandatory requirements. <p>Further, the policy basis for setting these locally mandatory standards is unclear. There isn't a national requirement that these levels are met. As far as I am aware the UDP does not contain a policy that establishes these requirement; although reference to level 3 of the Code is supported by the Pathfinder as it meets our own emerging policy, I fear this falls into the realm of</p>	<ul style="list-style-type: none"> Comments noted. The RSS is clear that local authorities should prepare documents, including SPDs, that ensure more innovative design incorporating more efficient use of energy and materials and more eco-friendly and adaptable buildings. Targets in respect of the Code for Sustainable Homes correspond with those suggested in the proposed RSS (which are not proposed to be altered when RSS is finalised). <p>Policy EM/13 of the UDP states that energy consumption should be an important consideration in the design and construction of new development. The SPD expands upon this policy and policy EM/16.</p>	<ul style="list-style-type: none"> No changes to be made No changes to be made

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		making new policy and therefore goes beyond the scope of the SPD.		
14.	The Theatres Trust	No comment	<ul style="list-style-type: none"> No comment 	<ul style="list-style-type: none"> No changes to be made
15.	Bellway Homes Ltd	<ul style="list-style-type: none"> As a national volume house builder, we seek clear, precise and concise upfront guidance from Councils. Policies not only inform planning applications but also decisions on land acquisition and therefore land values and whether new investment ultimately takes place. This is important in areas where economic indicators are below the national average and the SPD should be seen within this context. We ask that your SPD makes it clear that those matters covered in the document are not a mandatory requirement for house builders, a position endorsed at national level. As an industry, you will be aware that technology is being applied and tested but has not advanced in a cost-effective way as yet for it to be applied consistently. Some systems do not deliver environmental benefits and should be avoided. The resource costs associated with various solutions is still being measured in many instances. Our approach is therefore one of priorities and taking all material planning considerations, including development costs, into account. In this way, if regeneration / site clearance / remediation is deemed the priority, the SPD will not prevent development from taking place. 	<ul style="list-style-type: none"> It is argued that the SPD meets the requirement of being clear, precise and concise. The planning authority is required to balance economic, social and environmental considerations, including setting mandatory targets for renewable energy generation. As previously stated, this document has been developed in close consultation with expert consultants with considerable experience in these matters. Their advice is that new commercial and residential developments should have little difficulty in meeting the requirements. 	<ul style="list-style-type: none"> No changes to be made No changes to be made
16.	Yorkshire Forward	<ul style="list-style-type: none"> We consider the approach taken within the SPD to be appropriate. There would also be a benefit 	<ul style="list-style-type: none"> Noted. Will investigate linkage with the Simplified Building Energy Model. 	<ul style="list-style-type: none"> Reference to be made to the Simplified Building Energy Model

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		in linking this SPD to the Simplified Building Energy Model, as a means of measuring the CO2 emissions associated with individual buildings.		
17.	United Utilities	<ul style="list-style-type: none"> Satisfied with the document 	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> No changes to be made
18.	National Trust	<ul style="list-style-type: none"> The National Trust is especially pleased to see the emphasis given to energy efficiency; there are significant benefits to be gained from reducing our requirements from energy and this will always be more productive / cost effective than the installation of renewable energy technologies. For similar reasons the Objectives are also supported. Page 5 of the draft SPD will need to be updated in respect of the Code for Sustainable Homes (new technical document issued by DCLG April 2008) and the PD changes that came in early April. It is not considered that the requirements set out are unduly onerous. Practical work has shown that it is quite possible to achieve energy efficiency standards well in excess of the current Building Regulations. It is not explicit in the text but it is assumed that the reference in Section 2 to 'new development' should be taken to include changes of use. The Trust would note that despite the constraints of existing building structures it is quite feasible to install improved insulation and renewable energy technologies. It appears that there are no specific references in respect of Energy Statements to energy 	<ul style="list-style-type: none"> Noted. The SPD should be updated to make reference to the latest policy documents and guidance. Noted. It is assumed that the requirements also relate to refurbishments and changes of use, however it is agreed that this should be made more explicit in the document. It is pertinent to investigate including wording in respect of measures to reduce energy demand as suggested. It is not intended that the SPD be guidance in respect of sustainable construction. It is considered that it would be useful to make reference to Gibson Mill. 	<ul style="list-style-type: none"> No changes to be made Reference to be made to the documents indicated No changes to be made Amend document to refer to refurbishments and changes of use that require planning permission and which exceed the thresholds of 5 or more dwellings or non-domestic development of more than 500 square metres Relevant section to make specific reference to measures to reduce energy demand No changes to be made Relevant section to refer to the example of Gibson Mill

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<p>efficiency per se. It would be unduly harsh if an extremely energy efficient development was proposed but then required to meet the same renewable target as a much poorer (energy inefficient) designed project. It is suggested that at 'A' there should be specific reference to the measures to be taken in the design to reduce energy demand.</p> <ul style="list-style-type: none"> • If the Objectives of the document are intended to encompass 'sustainable construction' then its scope needs to be broadened to consider matters such as water minimisation / grey water recycling, waste minimisation / recycling, and encouragement of sustainable modes of travel. • In respect of para 6.4, particular reference could be made to turbines at Gibson Mill. 		
19.	Government Office North West	<ul style="list-style-type: none"> • The main comment we wish to make relates to the fact that requirements for new development in respect of energy efficiency and the use of on-site renewable energy technologies are being set out in an SPD rather than a DPD. You will be aware that PPS1 Planning and Climate Change Supplement says at paragraph 33: <p><i>Any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD, not a supplementary planning document, so as to ensure examination by an independent inspector.</i></p> <p>This would seem to rule out your proposed approach of handling these matters through SPDs.</p>	<ul style="list-style-type: none"> • It should be clarified that the SPD, by its nature, is not creating policy but expanding upon existing policy. The Climate Change Supplement indicates in its introduction that the policies within it are capable of being material considerations when determining planning applications. Paragraph 39 states that LPAs should ensure that proposed development is consistent with the PPS. It is fair to developers to have a document – this SPD – which explains to developers how we will interpret policies including PPS1 with regard to energy and climate change. Given that we are expected to apply Government policy, we need to be able to show how we will apply it. • However, the SPD's applicability should 	<ul style="list-style-type: none"> • 'Purpose of this document' section to be amended to indicate that the Council will be seeking to apply Government policy on climate change as currently expressed in the PPS Supplement, and the SPD gives guidance on what the Council will expect of developers in order to comply with Government policy.

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			be made clear in its preamble.	
20.	Morris Homes (North) Limited	<ul style="list-style-type: none"> • Various Councils are introducing various individual policy documents in relation to sustainable design and renewable energy when most of the issues are already covered by national policy. We therefore see no need to produce such a document and object to the requirements contained therein. • Not only is it difficult to achieve a certain criteria, there is no clear guidance regarding the different levels for Code for Sustainable Homes, nor is there sufficient capacity within the industry and within the Councils to evaluate such information. It is not always possible for developments to achieve certain levels under Sustainable Homes criteria, due to the onerous requirements associated with the abnormal costs. Therefore, each development needs to be considered on its own merits. • There is no possibility of delivering the number of new homes required in the light of this continuous red tape. • All these requirements should be covered under the Building Regulations and indeed most of them are. • By far the biggest problem is with the existing housing stock and no documents are being adhered to in this respect, and this needs to be tackled by authorities to have any impact on reducing CO2 emissions. • We insist that this document is withdrawn and reliance placed upon national policies within the RSS and Building Regulations. 	<ul style="list-style-type: none"> • National guidance, rightly or wrongly, makes it clear that targets of this sort should be determined at local level. • As with renewable energy targets, energy efficiency targets are expected to be set at a local level. The targets outlined in the SPD are in line with those in the proposed RSS, which are not proposed to be altered when the RSS is finalised. It should also be noted that compliance with the Code is now mandatory. • Sustainable development is the core principle underpinning planning. Planning authorities are required to balance the social, economic and environmental strands of sustainable development in accordance with national and regional guidance, and this includes setting targets for energy efficiency as well as for housing developments. • The RSS is clear that local authorities should prepare documents, including SPDs, that ensure more innovative design incorporating more efficient use of energy and materials and more eco-friendly and adaptable buildings. Targets in respect of energy efficiency correspond with those suggested in the proposed RSS. • It is acknowledged that the upgrading of existing building stock is very significant in terms of reducing CO2 emissions and tackling climate change. However, this is 	<ul style="list-style-type: none"> • No changes to be made • No changes to be made • No changes to be made • No changes to be made • Amend document to refer to refurbishments and changes of use that require planning permission and which exceed the thresholds of 5 or more dwellings or non-domestic development of more than 500 square metres • No changes to be made • Section 2 to be amended to make the requirements clearer

	Respondent	Comment	Response	Recommendation/Change (<i>proposed new text in italics</i>)
		<ul style="list-style-type: none"> Section 2 is not clear on what the immediate requirements would be 	<p>something that generally falls outside the remit of planning authorities. However, this document will be amended to ensure that refurbishments and changes of use that require planning permission are brought under the requirements.</p> <ul style="list-style-type: none"> As stated previously, local authorities are expected to produce documents outlining requirements such as these. It is agreed that section 2 should make the requirements clearer. 	
21.	Oldham Borough Council	<ul style="list-style-type: none"> Oldham MBC is pleased that the SPD encourages developers to make a 10% reduction in CO2 emissions through the provision of on-site renewable or low carbon energy generation. Section 6 provides a good description and guidance on renewable technologies and low carbon energy supply. However, it is felt that the SPD may be of further benefit to developers and planning officers if it expands more on some of the planning issues, in terms of the potential impacts that renewable technologies may have. For example, under wind turbines some of the issues it could mention are shadow flicker, cumulative impacts and existing transmitting or receiving systems. This will assist developers in giving consideration to such issues at the early stages of a planning application. 	<ul style="list-style-type: none"> Noted. It is felt that the issues which have been raised are pertinent in particular to stand-alone renewable energy developments, rather than the kind of developments to which this document is likely to relate. The planning issues sections are necessarily fairly generalised, and regard of course must be had to all relevant planning policies and documents. 	<ul style="list-style-type: none"> No changes to be made No changes to be made
22.	The Emerson Group	<ul style="list-style-type: none"> No comments at this stage 	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> No changes to be made

