

Guildford Borough Council

Draft Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document (SPD)

Consultation Statement

August 2024

Prepared in accordance with Regulation 12 of the
Town and Country Planning (Local Development) (England) Regulations
2012

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1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 Regulation 12(a) requires that before adopting a Supplementary Planning Document (SPD), a statement must be prepared setting out:
 - the persons whom the authority consulted when preparing the SPD;
 - a summary of the main issues raised by those persons; and
 - how those issues have been addressed in the SPD
- 1.3 The purpose of the Climate Change, Sustainable Design, Construction and Energy SPD ('the SPD') is to update and supersede the Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document that was adopted in 2020.

2. Preparing the draft SPD

- 1.4 Since the SPD was adopted in 2020, there have been significant changes in the national and local policy context, alongside an increasing emphasis nationally on the Climate Change agenda. The SPD responds to these changes in circumstances and provides greater clarity on the information the Council expects and requires to be submitted with planning applications.
- 1.5 The SPD draws together and outlines the Local Plan policies that are relevant for climate change and sustainable design, construction and energy. The SPD supports the Local Plan policies by providing detailed guidance on the Local Plan policies and then sets out the information that must be included to meet the energy requirements, sustainability requirements as well as guidance on applications for renewable and low carbon energy generation and storage developments.
- 1.6 The SPD was produced through close coordination with the Council's Development Management team. The iterative process allowed the SPD to comprehensively respond to specific issues arising from planning applications coming forward within the borough.
- 1.7 Furthermore, direct engagement was made with councillors through both the cross-party Local Plan Panel and Climate Change Board. Councillors on the Local Plan Panel were invited to comment on a draft SPD prior to wider public consultation at a meeting on 07 May 2024, Panel members are also expected to share and feedback the views from their respective parties. Members of the Climate Change Board also received and were invited to comment on a draft SPD at a meeting on 22 May 2024, prior to wider public consultation.

- 1.8 The main responses from the Local Plan Panel and Climate Change Board which assisted in finalising the draft SPD are highlighted in Table 1 on the following page.

Table 1. Main comments arising from internal consultation process and resulting actions

Response	Action
Wider aspects such as social resilience could be considered.	There is no social resilience policy in the adopted Local Plan, the SPD can only add guidance to existing Local Plan policies. If the updated Local Plan includes additional policies, then the SPD can be updated accordingly to reflect them. Local Plan policy and the SPD cover the main climate impacts on vulnerable community members e.g. overheating.
The SPD should refer to Neighbourhood Plans where it references parking requirements.	A reference to parking standards set out in adopted Neighbourhood Plans has been added at paragraph 5.31.
There should be additional detail about the proposed regulatory changes to recycling.	Text has been added at paragraphs 5.38 and 5.39 which outlines the proposed changes are led by central Government, but currently there are no details on what these changes will entail.
There is no specific information about the demolition of Listed, Locally Listed or Heritage Assets.	Listed Buildings and Heritage Assets are protected by the Local Plan policies. The SPD contains new guidance for applications proposing demolition from a sustainability perspective.
Additional guidance is needed on how developments can mitigate the risk of overheating.	Text has been added to the guidance at paragraph 5.107 and the questionnaire to provide examples of passive design measures (e.g. external shuttering and vegetation).
It would be helpful if the term 'Heat Priority Area' was in the Glossary.	A definition has been added to the Glossary.
Non permeable surfaces should be discouraged.	The SPD highlights LPDMP Policy D15 (4) – Climate Change Adaptation and outlines that where new hard surfaces are proposed they will normally need to be of permeable materials. Other Local Plan policies provide further detail on flooding and sustainable surface water management. Some instances where impermeable surfaces are used are beyond the scope of planning control.
The definition of adequate / proportionate in para 3.2 could be clearer.	The terms proportionate and adequate come from LPSS Policy D2 (3) and (11) and provide flexibility to ensure sufficient information is submitted by all planning applications. The level of information

	necessary to allow the decision maker to assess the proposal will vary depending on the scale of the proposal.
The submission requirements for BREEAM accredited applications are not clear.	Paragraphs 3.10-3.13 set out how applications that will achieve a BREEAM rating of Outstanding or Excellent. Additional references to pre-assessment reports and post-construction certificates have been added for clarity in paragraph 3.12.
There should be an introductory statement setting out the Council's environmental priorities and the declared climate emergency.	This would be beyond the remit of Planning Policy and Guidance. SPDs supplement and provide guidance to adopted policy. The Council's Climate Change Action Plan sets out the Council's aspirations and vision to address climate change.
In the Questionnaire under modern methods of construction there should a reference to sustainable materials.	It is considered the reference to low waste construction methods and the sub-section on sustainable materials are adequate.
At para 4.6 make it clearer that energy eliminated through design as well as measures.	Design measures are detailed elsewhere in the document, but a reference to design has been added for consistency.
The Questionnaire should reference how site layout should be considered.	The Questionnaire already requires applicants to provide details on how the site layout has been considered.
Support is offered to Zero Carbon development, could this be extended to other similar types e.g. Ultra-Low Impact and Ultra-Low Carbon.	A reference to other types of highly sustainable development has been added to paragraph 4.27.
When considering whether Very Special Circumstances (VSCs) exist to justify Green Belt development, would high environmental performance count towards this?	Factors that can be contribute towards VSCs are not defined in national policy. VSCs set a very high bar that should not be easily replicated across numerous proposals or be commonplace. For this reason VSCs are considered on a case-by-case basis. Consequently, it would not be appropriate for the SPD to provide guidance on how environmental performance would count towards VSCs although the decision maker may take these into account when considering proposals.
Greater clarity over requirements for householder applications, the questionnaire refers to this being submitted for householder, but it is not included in in the main text of the SPD.	Householder developments are already referred to in the footnote of page 6, but a reference has been added to the main text for clarity.

<p>When looking at the layouts of buildings there should be reference to passive solar gain.</p>	<p>Additional reference to solar gain has been added on page 10, and the link to Section 4 has been reinforced.</p>
<p>The document has a lot of words and not many pictures. Could we break up some of the text with pictures and diagrams.</p>	<p>Images and diagrams are not considered to be necessary unless they in themselves provide additional useful guidance.</p>
<p>A section containing FAQ's and a list of websites where people could get funding from for incorporating measures would be useful.</p>	<p>Paragraph 3.16 has been added which will provide a link to the Council's climate change website (once this goes live). Linking to individual websites would require the links and content of these websites to be monitored, and the climate change SPD updated when there are changes. Therefore, links to other websites and online sources of advice have not been included.</p>
<p>There is no information on retrospective measures that can be used on existing buildings, this could also refer applicants to useful websites.</p>	<p>Most retrospective measures would not require planning permission so it would be beyond the scope of planning control to detail such measures.</p>
<p>The topic of fit for purpose, adaptable, futureproof buildings should be made more prominent.</p>	<p>This topic is already set out separately ahead of other information at the start of the Climate Change Adaptation sub-section to ensure it is prominent to applicants.</p>
<p>It would be really innovative if major developments had to estimate the carbon impact of mobility. This would help to set the discussion in the Transport Assessment in terms of Carbon and impacts and could help the developers think about the overall footprint.</p>	<p>There is no transport policy in the adopted Local Plan that such a requirement could be linked to. The SPD can only add guidance to existing Local Plan policies. If the updated Local Plan includes additional policies, then the SPD can be updated accordingly to reflect them.</p>
<p>With reference to significant heat sources, low grade heat is becoming increasingly important from sewage treatment plants.</p>	<p>There is no relevant policy in the adopted Local Plan that such a requirement could be linked to. The SPD can only add guidance to existing Local Plan policies. If the updated Local Plan includes additional policies, then the SPD can be updated accordingly to reflect them.</p>
<p>While there is other policy on biodiversity, there is scope for it to be included as part of sustainable design detailed in this document.</p>	<p>It is considered that the Council's other policies sufficiently set out how biodiversity is considered. It would be beyond the scope of this SPD to include a</p>

	section on biodiversity in this document. The Development Plan must be read as a whole.
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3. Formal consultation on the draft SPD

- 1.9 A five-week consultation was held between **Friday 05 July 2024** (midday) and **Friday 09 August 2024** (midday). We advised those stakeholders (comprising organisations, members of the public, businesses and amenity groups) whose email addresses and postal addresses we hold on our consultation database.
- 1.10 During the consultation period, the consultation document was available on our website and paper copies of the consultation document were available in the borough's four libraries and in the main Council office at Millmead. These arrangements are in accordance with our [Statement of Community Involvement](#), May 2020.
- 1.11 The draft SPD has undergone a Habitat Regulations Assessment (HRA) screening to determine whether it would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The SPD has also undergone a Strategic Environmental Assessment (SEA) screening to determine the impact on the environment and to integrate considerations of the environment into the preparation and adoption of the SPD.
- 1.12 The Council is required to consult with Historic England, the Environment Agency and Natural England on all SEA screening opinions, and with Natural England on all HRA screening opinions, before formally determining whether a strategic environmental assessment and/or HRA appropriate assessment is needed. The conclusions outlined in the HRA/SEA screening document have been sent to the Environment Agency, Natural England and Historic England for consideration in tandem with the consultation on the SPD document. The responses of the organisations are included in the final SEA and HRA Determination Statement which is available on our website.

4. Finalising the SPD

- 1.13 All comments received as part of the consultation have been considered and appropriate changes made where these were considered justified.
- 1.14 Appendix 1 contains a table setting out the main issues raised during the public consultation. It also sets out the Council's response to each of the issues, the changes that were made to the SPD as a result of the issue, or explains why no changes were considered necessary.

1.15 The main issues raised by 'prescribed bodies'¹ are identified at the start, followed by 'other organisations'² and then 'other respondents' comprising of 'individuals/members of the public.

¹ As listed in Regulation 4 of the Town and Country Planning (Local Development) (England) Regulations 2012

² This includes statutory consultees, infrastructure providers, site promoters/developers and other community groups/organisations

Appendix 1 - consultation comments and GBC response

Prescribed bodies

Section / paragraph	Comment	GBC response
	National Highways	
	No comments. Fully supportive that the SPD mentions the need to maximise the use of the sustainable transport modes and provides alternatives to private motorised transport to reduce the number of vehicles per head of population whilst reducing need for parking and emissions.	Noted.
	Natural England	
	Whilst we welcome this opportunity to give our views, Natural England have no comments to make on this occasion.	Noted.
	Historic England	
	<p>Historic England's welcomes the Council's Draft Climate Change, Sustainable Design, Construction and Energy SPD. While it deals with many matters which are arguably beyond our remit, there are likely to be effects on the historic environment and heritage assets arising from the adaptation of landscapes and buildings to mitigate climate change effects.</p> <p>There is guidance available on the Historic England website that is relevant, and may be of assistance in developing this document or as reference material in relation to the climate change, sustainable development and energy efficiency effects on the historic environment: https://historicengland.org.uk/research/current/threats/heritage-climatechangeenvironment/impacts-climate-change/</p>	The links to the website and document have been added to the SPD.

	<p>Additionally, Historic England has recently published a Historic Environment Advice Note on the adaptation of historic buildings for carbon and energy efficiency. This is available to download: https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note18/</p>	
	Rushmoor Borough Council	
	We have no comments to make at this time, but please continue to notify us of future consultations.	Noted.
	Waverley Borough Council	
	Thank you for the opportunity to comment on the above consultation. Waverley Borough Council has declared a Climate Emergency and supports measures taken to tackle climate change and achieve net zero objectives in consultation with local communities.	Noted.
	Surrey County Council	
	We recommend that Sustainable Drainage (SuDS) is included in the green box on 'Sustainable Design' on page 25. These should be multifunctional providing not just attenuation but, water quality, biodiversity and amenity value.	SuDS are included in the Green Box on page 41, as the succeeding section provides guidance on their use.
5.121	This should also refer to NPPF paragraph 175, which refers to major applications and the requirement to introduce SuDS.	Paragraph 5.121 has been amended to reference paragraph 175 of the NPPF.
5.124	We would recommend that the alternative wording underlined below is included ' <i>The connection of surface waters to the public sewer will not be permitted without confirmation from the Lead Local Flood Authority (LLFA) (SCC) that the <u>drainage hierarchy for sequential approach to the disposal of surface water has been followed and all practical alternatives have been explored. Confirmation should also be sought from the sewerage undertaker to confirm the existing system has capacity to receive a new connection.</u></i> '	Paragraph 5.124 has been amended to include the alternative wording, alongside additional text requested by Thames Water.

5.127	The link to our SuDS design advice should also be added: Sustainable Drainage System Design Guidance - Surrey County Council (surreycc.gov.uk) .	A link to the SuDS design advice has been added as a footnote to Paragraph 5.127.
5.127	We would recommend that the wording underlined below is included <i>'The LLFA is consulted on proposals for SuDS within major developments as part of the planning process <u>and may also be consulted on non-major development located in areas of flood risk or within a catchment which contributes to downstream flood risk.</u>'</i>	Paragraph 5.127 has been amended to include alternative wording.
	The section on SuDS on page 44 should also highlight the requirement to ensure any existing watercourses are appropriately incorporated as part of the site layout.	This is beyond the scope of the SPD. However, LPDMP Policy P10 sets out the requirements for developments affecting watercourses and prohibits the culverting of watercourses.
	The section on sustainable transport on page 27 should make reference to the Healthy Streets for Surrey design code which aims to create more sustainable and better places.	The SPD provides additional guidance on adopted Local Plan policy. The Healthy Streets for Surrey design code has not been endorsed by the Council. Consequently, it is not considered necessary to refer to the Healthy Streets design code, if the Healthy Streets design code is endorsed in the future then the SPD can be updated accordingly to reflect this.
5.22	Should refer to maximising the use of sustainable transport modes in line with the Surrey Local Transport Plan 4 as well as the LPDMP Policy ID3.	A reference to the Surrey Local Transport Plan 4 has been added to Paragraph 5.22.
5.35	Should refer to SCC's Travel Plan Guidance. Add 'Further guidance is available here: SCC's Travel Plan Guidance.'	Local Plan policy sets out the criteria for the submission of a Travel Plan. If additional guidance is adopted and endorsed by the Council, then the SPD can be updated accordingly to reflect these changes.
5.95	The guidance could be stronger and specifically refer to methods of creating sympathetic energy efficient upgrades to heritage buildings.	Paragraph 5.96 now provides a link to Historic England's 'Adapting Historic Buildings for Energy and

		Carbon Efficiency' guidance. It would be prescriptive and beyond the scope of the SPD to refer to specific methods, because there can be significant variations between different heritage buildings.
	In relation to the sections on demolition and heritage buildings, we would like to see whole-life carbon assessments which include construction impacts encouraged, especially where applications involve the demolition of a pre-WWII building.	Paragraph 5.87 encourages the undertaking of a whole-life carbon assessment, however, requiring the submission of one is beyond the scope of the SPD. The NPPF and Local Plan policies already provide policy and guidance in relation to the demolition of heritage assets.

Other organisations

Section / paragraph	Comment	GBC response
	Burpham Community Association	
Para 6.6	We wonder how effective the expectations expressed in para 6.6 will be if they depend on an abstract notion of 'weighing up' without specific limits or aspirations.	Planning decision makers use their professional judgement to determine planning applications based upon the Development Plan and material considerations. The Local Plan and this SPD provide policies and additional guidance to assist the decision-making process.
	We expect the extra documentation will add to developers' costs, and be challenging to regulate.	The measures in the SPD are aligned with the provisions in Local Plan policy. The Local Plan: Strategy and Sites and the Local Plan: Development Management Policies have been subject to full viability assessments and public examinations where

		viability was considered. The plans as a whole were found to be viable.
	We wondered if some of it – like the energy statement – sits with Building Control which already covers thermal insulation and fire resistance.	There are elements where Policy overlaps with Building Regulations. However, Building Regulations are a different regime to planning policy so an application that complies with buildings regulations does not necessarily or automatically comply with planning policy. Adopted Local Plan policy sets standards that are often better than the minimum standards set by Building Regulations. The Planning and Energy Act 2008 grants Local Planning Authorities the powers to address energy efficiency.
	About 50% of carbon emissions are discharged in the creation of building materials, and this argues that we should pay more attention to repurposing buildings such as Debenhams and House of Fraser blocks.	The SPD covers demolition, embodied energy and change of use developments.
	Gatwick Airport Ltd	
	Thank you for your email dated 05 July 2024, regarding the above-mentioned consultation. We note that under para 4.76 'Wind Turbines' on pages 21 & 22 you have mentioned that you will consult with us with regard to any applications for wind turbines greater than a domestic scale for which we thank you. Other than the above we have no other comments to make on the document.	Noted.
	Guildford Allotments Co-Operative Society Ltd	
	The role of local allotments appears to have been overlooked in this document. Community food growing is recognised at para 5.40 and 5.41; but the notion of local allotments close to peoples homes is overlooked. Ideally, such allotment sites would be relatively small and	Allotments fall within the 'other types of open space' mentioned in paragraph 5.40 for which LPDMP Policy ID6 sets out minimum quantitative and expected maximum access standards. As there is a

	<p>within easy walking distance of peoples homes; this would reduce the need for transport as per para 5.22. It would enable people to grow their own sustainable healthy food, reducing food miles. All it needs is a little thought when planning a new development. And that also does everything suggested in para 5.40.</p>	<p>requirement, rather than simply encouragement for, the provision of/contribution towards allotments, it was considered unnecessary to mention their benefits in this part of this SPD, which is referring to the additional types of open space that are supported. However, a reference to the Open Space policy and Planning Contributions for Open Space in New Developments SPD has been added to the text with a link to the SPD in a footnote.</p>
	<p>Thames Water</p>	
	<p>Water efficiency We therefore consider that text in line with the following should be included in the SPD: “Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p>	<p>LPSS Policy D2 (1d) requires water efficiency in new development to meet the highest national standard and as a result the suggested condition is already applied. Paragraph 5.48 sets out how planning conditions will be used to ensure this standard is achieved in practice.</p>
	<p>Flood Risk and Sustainable Drainage With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water</p>	<p>Paragraph 5.124 has been amended to include the suggested text.</p>

	sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	
	Surrey Wildlife Trust	
6.8	We would advise that for all proposals, it should be ensured there are no adverse impacts caused by energy generation developments on protected habitat. We would also advise that consideration is given to direct/indirect impacts on protected sites within the Borough, including Ancient Woodland, Habitats of Principal Importance and locally selected Sites of Nature Conservation Importance.	Low carbon energy developments can be inappropriate in environmental impact terms and appropriateness will be considered on a case-by-case basis. The document will be read alongside all other relevant planning documents, including LPDMP Policies P6 and P7 which seek to protect and enhance the environment including those habitats and sites specified in the comment.
	With regards to sustainable design and climate change resilience/adaptation included within the draft SPD, the impacts of climate change on nature and how nature can mitigate climate change impacts is key. We recommend further consideration in this section is given to Green and Blue Infrastructure to be integrated within development.	While the SPD does include some references to Green and Blue infrastructure, the detailed policies in the LPDMP better addresses the design and biodiversity of new development.
	The Guildford Society	
4.17	The wording should be strengthened to ensure that there is a compelling case presented as to why gas boilers are required together with plans as to how conversion to electric heating can be achieved in the future.	Paragraph 4.17 requires applicants to provide explanation and justification for using a gas-fuelled system and sets out that gas-fuelled systems are not in accordance with the energy hierarchy unless justified. Paragraph 4.20 requires developments that are not proposing to use a heat pump to demonstrate that the building allows for one to be retrofitted at a later date. Therefore, it is considered unnecessary to add further guidance to this SPD.

4.22	Should also include a mention of a Direct Energy System. Electric Boilers for small properties using 'Green' electricity can be a viable option.	Paragraph 4.16 notes that direct electric systems are more efficient than gas-fuelled systems, and their use would be supported over gas at Step 2 of the energy hierarchy. Therefore, it is considered unnecessary to include additional text in this SPD.
4.26	Should standards such as Passivhaus be mentioned in this paragraph. We also attach the wording from an equivalent document prepared by Cornwall Council which we believe shows far stronger commitment to achieving high energy standards.	The Council's approach to developments pursuing a Passivhaus approach is set out in Paragraph 3.11. It is important to note that Cornwall Climate Emergency Development Plan is a Development Plan Document and not an SPD. Therefore, the ambitious standards contained in policies have undergone a full viability assessment and been found sound at Examination by a Planning Inspector. Including similar standards and requirements in the Guildford Climate Change SPD is beyond the scope of an SPD.
4.30	As part of the SPD cannot the council insist that new builds have a testing regime to ensure compliance with designed performance – 'Strongly Support' seems very weak.	Introducing an additional requirement would be beyond the scope of the SPD. Instead a policy would have to be developed through the local plan process, where the plan would be subject to a full viability assessment. However, where submitted energy information proposes to meet the fabric first/energy hierarchy policy by targeting an unusually low airtightness value, we condition the submission of airtightness testing because these need to be produced for building regulations purposes anyway.
4.66	The SPD should not ignore the use of Solar panels as elements of the facades of buildings or their use built into Brise Soleil. These cells may	Additional guidance has been added to Paragraph 4.68 stating PV panels should be integrated into the

	<p>not be 100% efficient but PV cells are cheap and can still provide useful power in sub optimal locations.</p> <p>The Cornish Paper at Appendix A also has some useful points on the positioning of PV cells see Appendix A Para 12.14</p>	<p>design of new rooves and facades and noting the potential use as brise soleil.</p>
4.69-4.73	<p>Heat Pumps can also be used for cooling buildings, but this should only be considered once passive systems are shown to be inadequate.</p>	<p>Agreed, LPDMP Policy D15 (1b) requires development proposals to demonstrate how new buildings will incorporate passive heat control measures, in line with the cooling hierarchy. This is detailed at Paragraph 5.107 of the SPD.</p>
	<p>Consideration needs to be given to the noise created by Heat Pump units.</p>	<p>Heat Pump noise is considered through the General Permitted Development Order, which requires a noise assessment to be passed before a heat pump to be considered permitted development. If a heat pump does not pass the assessment, then it will be subject to planning permission and noise will be considered as part of the application. Noise will also be considered as part of the planning decision making process for new buildings.</p> <p>The matter of noise impacts is addressed in LPDMP Policy D11. Given that the development plan is read as a whole it is not considered necessary to be referenced in this SPD.</p>
	<p>The Heat Pump radiators and compressors need to be designed into new buildings to limit visual intrusion on the neighbourhood.</p>	<p>The development plan is to be read as a whole, the LPDMP contains various policies to achieve high quality design and protect sensitive areas, including Heritage Assets and the natural environment.</p>

4.73	Our information is that it is not proven that heat pumps work best with under floor heating – they can with good configuration work with conventional radiators.	Underfloor heating is typically more efficient than radiators for low temperature systems due to the greater heat emitting area. However, it is agreed that they work well with appropriately sized radiators. Paragraph 4.73 has been amended to reference that heat pumps work well with appropriately sized radiators that are designed for a lower flow temperature.
	The SPD should mention Direct Heat systems e.g. Electric Boilers as a viable option for smaller properties, especially flats PROVIDED they use a green Energy Tariff. These systems may be very applicable to upgrading existing properties.	Paragraph 4.16 notes that direct electric systems are more efficient than gas-fuelled systems, and their use would be supported over gas at Step 2 of the energy hierarchy. Therefore, it is considered unnecessary to include additional text in this SPD. The point about tariffs is understood but could not be taken into account in a planning decision as there is no way of enforcing the use of a tariff.
	The SPD should discuss the use of Heat Exchangers where hot air is exhausted from a building routed through a heat exchanger to heat incoming air. This normally will require an element of mechanical ventilation.	A reference to heat exchangers has been added to Paragraph 4.18. While the SPD promote passive systems above powered systems in the interests of efficiency, where mechanical heat vent recovery would result in a better emissions outcome, the SPD would allow this to be taken into account.
5.83 - 5.85 - 5.92	There should be an introductory paragraph at the start of sustainable design laying out summary principles that are contained in para's 5.83 - 5.85 - 5.92.	The Council consider the table at Paragraph 5.3 sufficiently sets out the succeeding content, a more detailed summary is then provided in the green box for each topic e.g. natural resources.
5.6, 5.7 5.11	These paragraphs need combining and replaced by a better explanation on the issues with Solar Gain. An example 'create spaces that maximise	The development plan, and SPD, is to be read as a whole, LPDMP Policy D15 (1a and 1b) require

	<p>heat receipts' is a very strong statement, surely it should be to 'create spaces that capture solar gain whilst not overheating during mid-summer'.</p> <p>NOTE: The Good Homes Alliance have published two relevant reports: SHADING FOR HOUSING - Design guide for a changing climate OVERHEATING IN NEW HOMES - Tool and guidance for identifying and mitigating early stage overheating risks in new homes</p>	<p>development to be designed to provide comfort for occupiers in line with the cooling hierarchy. Guidance is detailed in Paragraphs 5.103-5.113. Paragraph 5.7 has been amended to say '...create spaces that capture solar gain whilst avoiding overheating...'. The Shading for Housing report has been added as a footnote on page 43.</p>
5.29	<p>Should large developments be required to provide parking spaces for DRT to allow for layovers and/or opportunity charging of the vehicles concerned?</p>	<p>This is outside the scope of this SPD.</p>
5.37	<p>As with Heat Pumps the visual impact of battery units needs to be considered when designing new accommodation or upgrading existing building stock</p>	<p>The development plan will be read as a whole, the LPDMP contains various policies to achieve high quality design and protect sensitive areas, including Heritage Assets and the natural environment.</p>
	<p>The Society is aware of an application (24/P/01144) for the 'Construction and operation of a micro energy storage unit in Guildford'.</p> <p>The SPD should consider how these applications should be considered as they may have a considerable impact on streetscapes.</p>	<p>The development plan is to be read as a whole, the Local Plan and NPPF contain various policies that consider the impact of development on streetscapes. Consequently, it is not considered necessary to add further guidance to the SPD.</p>
5.65	<p>We agree with the policy but suggest it should also include the word adaptation. The paragraph implies deconstruction, clever design may allow for adaptation e.g moveable walls, the ability to plug in room modules.</p>	<p>Paragraph 5.65 has been amended, and now references the Circular Economy and adaption.</p>
	<p>We would propose there should be a reference to having a risk based approach to the renovation of heritage/pre 1919 building stock to ensure the Heritage value is not lost as well as to reduce the risk of damaging building fabric with inappropriate measures.</p>	<p>The development plan is to be read as a whole, the Local Plan and NPPF contain various policies to protect and conserve the historic environment. However, links to relevant Historic England guidance have been added.</p>

5.96	There is considerable technical advice on improving the energy efficiency of historic buildings provided by Historic England – the provided link doesn't work.	The link to the Historic England document has been updated, and a link to additional guidance added as a footnote.
5.107	The terms for Mechanical Cooling are unclear.	The references have been changed to mechanical ventilation and active cooling for clarity.
5.110	It should be noted that hard surfaces also REFLECT heat into buildings. Landscaping of buildings to use green borders to reduce reflected heat should be designed in.	The comment is noted. However, it is not considered necessary to include additional text to explain the concept of the Urban Heat Island.
	Does mention need to be made about having buildings with appropriately sized gutters and down-pipes.	The comment is noted. However, it is not considered necessary to add further guidance into this SPD.
	Should the SPD have another paragraph discussing the issue of National Landscape. Surrey Hills National Landscape have produced a position statement on Solar Arrays that should be considered for inclusion.	The development plan is to be read as a whole, the Local Plan (LPSS Policies P1-3) and NPPF contain various policies to protect the natural environment, including the Surrey Hills National Landscape. However, additional text has been added to Paragraph 6.16 stating "Where relevant, this must include consideration of the Surrey Hills National Landscape in accordance with LPSS Policy P1."
	Zero Carbon Guildford	
	The document does not go beyond the national minimum standards and the policies proposed will not provide the step change in reduction of resource use required to meet Guildford Borough Council's targets set when declaring a Climate Emergency. The language in the proposed policy often is phrased as "strongly support" rather than using "strongly encourage" or even mandating measures.	The SPD can only add guidance to existing Local Plan policies, so it would be beyond the remit of the SPD to mandate additional measures.
	North Kesteven District Council, for example, has set policies that go beyond the future homes standard including requiring that new developments must generate renewable energy equivalent to the	This is beyond the scope of the SPD. There is no relevant policy in the adopted Local Plan that such a requirement could be linked to. If the updated Local

	<p>annual energy needs of the property except for in limited circumstances. They also strongly encourage the use of the Passive House Planning Package (RHPP) over Standard Assessment Protocol (SAP) due to known limitations in SAP such as not it not accurately predicting future energy use.</p>	<p>Plan includes additional policies, then the SPD can be updated accordingly to reflect them.</p>
	<p>When it comes to offsetting, although this is a very last resort, it would be good to include language indicating that offsetting should be as local as possible and preferably within the borough. It is certainly preferable to limit offsetting projects to being UK based where the effectiveness can be easily measured.</p>	<p>Additional guidance has been added to Paragraph 4.25, setting out a non-exhaustive list of factors that will be considered by Decision Makers when assessing offsetting proposals.</p>
	<p>We would like to see more positive support for decentralised energy networks which, alongside support from GBC for the Local Energy Bill, will help prevent the losses involved in National Grid transmission and cut bills for residents.</p>	<p>LPDMP Policies D16 (1-3) and LPSS Policy D2 (8) require applicants to include an appraisal of the feasibility of provision or connection to low carbon heat networks. LPDMP Policy D17 (1) provides support to proposals for renewable and low carbon energy generation and energy storage development, covering both power and heat. As a result, it is not considered necessary to add guidance to the SPD.</p>
	<p>It is disappointing to see that it would still be allowed for a CHP Heat Network to be powered by natural gas instead of electric, especially if generated on-site. The end of life of gas engines could be decades with appropriate maintenance and replacement parts. The suggestion that a CHP could also be biomass powered is also difficult to justify in the light of the arguments in paragraph 4.75.</p>	<p>The SPD makes it clear that the lowest carbon solutions will be favoured and that there is flexibility on this basis. Paragraph 4.59 has been amended to state 'Zero carbon fuels and electricity should be selected, taking into account potential impacts on air quality. Any heat network proposing to use a gas-fuelled system needs to explain and justify why this has been chosen instead of a more efficient low or zero carbon alternative...'. </p>

		The amendment allows for exceptional situations where a high-efficiency gas CHP heat network may be the best available option and this can be established on a case-by-case basis from evidenced justification, taking account of the opportunity to replace the gas engine at the end of its life with an engine using a different fuel source.
	The policy defines that adequate space needs to be allocated for storage of recycling. We would like to see this expanded to explicitly include storage for food waste as this has been neglected in concentrated developments in the past and has not been adequately supported by the GBC refuse collection infrastructure.	Paragraphs 5.38 notes changes to the regulatory system have been proposed, and led, by central Government, but currently there are no details on what these changes will entail. A reference to food waste has been added to Paragraph 5.39.
	The document acknowledges that construction accounts for one third of UK waste but offers very little in ensuring that waste is reduced. We would encourage a presumption against demolition of existing buildings and encouragement for constructors to rethink their supply chains to help create a circular economy.	Paragraphs 5.83-5.91 set out the Council's approach to applications proposing demolition, this includes minimising and reusing waste in line with the waste hierarchy, in accordance with LPDMP Policy D2 (2). Paragraph 5.79 – 5.82 provide guidance for LPDMP Policy D14 (5) which requires proposals for major development, and development proposals that involve the demolition of at least one building and/or engineering works that involve the importation or excavation of hard core, soils, sand and other materials to submit a Site Waste Management Plan A reference to the Circular Economy has also been added to Paragraph 5.65.
	Taylor Wimpey (Stantec obo Taylor Wimpey)	
	Whilst it is recognised that the 10% DFEE target is a means to demonstrate compliance and not a policy requirement, we would	Building Regulations set minimum standards (worst case scenarios) and only meeting them does

	consider that stronger evidence should be provided to justify the 10% reduction target for it to be considered sound.	therefore not indicate a fabric first approach has been followed. The 10% DFEE reduction is a result of benchmarking of local schemes built to Building Regulations Part L 2021 standards. The Council considers that the approach taken is appropriate for an SPD and as it is not a requirement, the level of evidence is appropriate.
4.16	Paragraph 4.16 of the draft SPD states that “Heat pumps have become by far the most common choice for heating and hot water in new buildings” but no evidence is provided to support this statement. We propose a reference should be provided to evidence this statement to improve soundness and support other policy makers.	The text in Paragraph 4.16 has been amended to reference new buildings in Guildford Borough. The basis of the statement is from monitoring planning applications for new buildings across the borough.
4.20	We therefore do not support paragraph 4.20 which states “Developments that are not proposing to use a heat pump must demonstrate that the building allows for one to be retrofitted at a later date, for instance by providing hot water or heat storage (e.g. a hot water cylinder or heat battery) and space for piping” and propose it should be omitted as it does not allow for suitable flexibility in design and could impact on the deliverability of sites or certain dwelling types. We propose that paragraph 4.20 should be omitted in favour of conducting an energy appraisal assessing a full range of available technology options as set out under paragraph 4.62 and including heat network technology and connecting to existing networks as set out in paragraph 4.47. Furthermore, the provision of hot water storage and space for piping is expected to be prohibitive in smaller apartment types, where the lower heating and hot water demand is more suitable to direct acting systems rather than hot water storage systems which	The guidance in Paragraph 4.20 has been amended to state “New buildings are required to be adaptable for future energy systems under LPSS Policy D2 (4). Developments that are not proposing to use a heat pump must demonstrate that the building allows for one to be retrofitted at a later date, for instance by providing <u>space for</u> hot water or heat storage (e.g. a hot water cylinder or heat battery) and space for piping, <u>unless it can be shown this is would not be appropriate for the specific circumstances of the development (e.g. a small flat with significant space constraints).”</u> .

	would be less efficient and reduce available storage space for the occupants.	
	To improve the effectiveness of Step 4 of the energy hierarchy – offsetting carbon emissions – it may be beneficial to give further guidance on acceptable forms of offsetting.	Additional guidance has been added to Paragraph 4.25, setting out a non-exhaustive list of factors that will be considered by Decision Makers.
4.9 and 4.39	We support this aim and would seek to clarify in paragraphs 4.9 and 4.39 that Building Regulations England Part L (BREL) compliance reports (or other Part L outputs such as DFEE, BER or DER metrics) should only be considered proportionate for Full or Reserved Matters Applications, as Outline Applications are unlikely to include building design drawings.	Paragraph 3.5-3.7 in Section 3 set out the information submission requirements for different types of planning application. It states that energy information will only be required for applications that include information about the buildings that will be constructed. Text has been added to Paragraph 4.1 stating “Detailed information such as energy modelling data may not be provided at the outline application stage (see Section 3), but if indicative energy modelling data is available it should be provided.”
4.39 and 4.41	Paragraph 4.39 states that “DER calculations will be necessary for each type of dwelling but not for each individual dwelling”, however GBC’s definition of “type of dwelling” is not clear. We propose that this should be defined as dwelling typology i.e. detached, semi-detached, terrace, apartment for residential buildings, and structural/construction type for non-domestic buildings. We also do not support paragraph 4.41 which states “In schemes where each dwelling is a bespoke design it is necessary to provide DER calculations for each individual dwelling”. Industry best practice is to ensure energy assessment are carried out for a minimum 10% sample of all buildings proposed, ensuring a representative sample of all the building typologies present. The draft wording would lead to an	Paragraph 4.39 (now 4.40) has been amended to refer to standard dwelling models of the same design rather than ‘types’ of dwelling in order to avoid confusion between type and typology. Schemes for which all dwellings are a bespoke design (i.e. each unit is unique) tend to be smaller schemes and the text still requires a SAP assessment for each unique dwelling. We have found that this approach works in practice as major developers usually have SAP reports for each of their standard models and can provide SAP data in their energy statements, and smaller

	<p>unproportionate level of detail within submitted applications. We propose paragraph 4.41 is amended to state a fixed sample rate, for example “In schemes where each dwelling is a bespoke design it is necessary to provide DER calculations for a sample of at least 20% of all dwellings”, this sample size goes beyond industry best practice, but ensures bespoke design sites are not burdened unnecessarily.</p>	<p>developers have been able to provide SAP reports for each unit.</p>
4.40	<p>We do not support paragraph 4.40 and propose it should be omitted. Part L methodology compares a proposed dwelling with a target model design, which is intended to allow for variation in dwelling type and size with minimal variation in carbon performance. However these marginal variations in carbon performance can occur due to both dwelling orientation and position in relation to other buildings, so the current wording of paragraph 4.40 could require a large number of energy assessments to be carried out with little additional benefit. This would therefore lead to an unproportionate level of detail within submitted applications as well as placing an unnecessary costly burden on applicants.</p>	<p>Paragraph 4.40 has been deleted.</p>
4.42	<p>Paragraph 4.42 encourages the implementation of measures to reduce unregulated energy demand as an example of how to demonstrate compliance with this policy. The deliverability and effectiveness of the SPD could be improved by providing guidance on a broader range of routes to compliance for example electric vehicle charging, waste reduction measures, smart heating controls, or water efficiency measures.</p>	<p>The development plan (including the SPD) is to be read as a whole. Section 5 of the SPD details further measures, specifically Paragraphs 5.36 and 5.37. As a result, it is not considered necessary to add further guidance to this SPD.</p>
5.19	<p>To improve the deliverability and effectiveness of the draft SPD we propose that further clarification is provided on the checklist that should be provided under paragraph 5.19 as the content of this checklist is currently unclear, we propose this is clarified to state that a</p>	<p>The text in Paragraph 5.19 has been amended to state “To meet the requirements of LPSS Policy D1 (2), a self-assessment against the questions set out in the latest BHL guidance should be included within</p>

	self-assessment of BHL should be included within the Design and Access Statement, or other supporting planning application documents.	the Design and Access Statement, or other supporting planning application documents. The Council will engage positively with developers to assist them in receiving BHL Commendation.”.
5.55	We support the additional guidance provided on embodied carbon and materials specification provided in the draft SPD, however it is currently unclear how paragraph 5.55 stating “The level of information provided should be proportional to the application” applies to Outline Planning Application, for which it is often not possible to provide building specific embodied carbon assessments. We propose that in the case of Outline Planning Applications, a discussion of measures proposed to reduce embodied carbon should be incorporated within the Sustainability Statement without the need for supporting assessments as defined by BS EN 15978.	The text ‘The Sustainability Statement submitted with an Outline Planning Application should discuss the measures proposed to reduce embodied carbon’ has been inserted in Paragraph 5.54. Paragraph 5.55 has been amended to make it clear that ‘proportional’ refers to the scale of development.
	We support GBC’s encouragement of the Structural Carbon Rating Scheme (SCORS) where applicants are seeking to exceed policy requirement, and we would welcome more detail on how the Council propose to periodically review the target SCORS rating to ensure it is appropriate and deliverable.	The Council continually monitors the effectiveness of planning policies and SPDs and will review the target, and SPD as a whole, when there are significant changes to national and local policy or practice. For instance, any substantive changes to relevant sections of the NPPF or a new Local Plan is adopted.
5.103-5.106	Paragraphs 5.103-5.106 set out a number of routes to demonstrate compliance with LPDMP Policy D15 (1a) and address overheating risk including Part O simplified method as well as dynamic thermal modelling via a CIBSE TM52 or TM59 assessment. The second bullet point of the climate change adaptation content summary on page 40 is limited to the CIBSE methodologies only. We recommend that Part O compliance is added to bullet point 2 on page 40 to clarify that it is a suitable method of demonstrating compliance.	The second bullet in the summary box refers to the requirements for developments in the Urban Areas only, as set out in Paragraph 5.113. The guidance makes it clear that either the Simplified Method or CIBSE route can be taken to demonstrate compliance for development outside of the Urban Areas, but for major developments in Urban Areas the simplified

		method is not adequate to demonstrate policy compliance.
	Blackwell Park Ltd (tor&co obo Blackwell Park Ltd)	
3.6	For outline applications, where detailed information may be limited, paragraph 3.6 of Section 3 (Overview of the Information Required by Decision Makers), states that ‘the level of detail within submitted information should be proportionate to the level of detail within the application’. BPL consider that this subjective approach creates ambiguity regarding the expectations for outline applications, potentially leading to unnecessary delays post-submission where applicants are deemed to provide insufficient detail in their statements to satisfy the officer’s requirements. BPL would therefore welcome greater clarity in terms of what constitutes proportionate detail at paragraph 3.6 and in order to remove ambiguity and the potential for inconsistent interpretation of this guidance. BPL would recommend that the guidance provides a definitive list of required information for outline and detailed applications.	The Council considers that Paragraph 3.6 adequately sets out the submission requirements for outline planning applications. Due to the nature of outline planning applications it would be restrictive for there to be a definitive list of required information, what is required for one application may be different to another. This guidance has been in place since 2020 and has been implemented.
4.1	As highlighted above, the guidance should be specific about what is required from an Energy Statement accompanying outline applications at paragraph 4.1, or at least confirm that detailed modelling data related to carbon emission rates is not expected to be provided.	Text has been added to Paragraph 4.1 stating “Detailed information such as energy modelling data may not be provided at the outline application stage (see Section 3), but if indicative energy modelling data is available it should be provided.”
	It should be made clear that individual site circumstances will be taken into account in considering whether opportunities for making best use of the surrounding environment have been optimised and there should be an ability to agree with the LPA that the approach has been followed ‘on balance’.	The extent to which the surrounding environment has been best used will be considered on a case-by-case basis. It would be unreasonable not to take site circumstances into account in the planning decision

		making process. As a result, it is not considered necessary to add further guidance into this SPD.
	It is considered that overall scheme viability is another factor that should be taken into consideration in the list of detailed information that can be provided to demonstrate what is 'reasonably achievable' and should be included.	Bullet point four of Paragraph 4.13 states a cost benefit analysis could be submitted to demonstrate how the proposed approach is reasonably the best achievable standard. The Council considers this to adequately cover viability. Consequently, it is not considered necessary to include additional guidance in this SPD.
4.25	The SPD should provide explicit guidance at paragraph 4.25 on the methodology for assessing applications acceptability to offset carbon emissions and the process for applying or calculating these offsets. At present, the guidance is open-ended. Transparent assessment criteria and a formula for how to calculate a carbon off-set as a payment in lieu with a worked example is required in this guidance, even if it is highlighted as a last resort in the energy hierarchy.	Introducing a formula would be beyond the scope of the SPD as the Council does not currently operate an offsetting scheme. Instead, additional guidance has been added to Paragraph 4.25, setting out a non-exhaustive list of factors that will be considered by Decision Makers.
	In identifying clear reasons why a connection might not be feasible, we would recommend that the words 'or viable' are added. There may be circumstances where it is physically possible to connect, but the cost of creating that connection would make the scheme unviable.	The Councils considers Paragraph 4.51 provides sufficient flexibility to applicants who do not propose to connect to existing heat networks. Feasibility would allow the consideration of viability. Consequently, it is not considered necessary to add further text to this SPD.
	The requirement for energy statements to investigate the potential to connect to existing heat networks in the vicinity of the site should have a clearly defined vicinity. Requiring exploration of all opportunities at all scales could be onerous. The SPD would significantly benefit from identifying on a map where existing district heat networks are located, specifying the providers, and indicating whether they have existing	We do not agree vicinity should be defined because, the reasonable connection distance for a given heat network will depend upon the specification of the heat network and local circumstances.

	capacity for connection. This would provide developers with a clear understanding of the potential for connection, rather than placing the onus entirely on the applicant.	Case officers will investigate whether existing heat networks can be mapped and added to the online planning information map.
	The SPD should be explicit about Heat Priority Areas and clarify where such connections are expected.	As noted in Paragraph 4.53, Heat Priority Areas are explicitly set out in Appendix 1 – Map of Heat Priority Areas.
4.53 and 4.54	Additionally, the requirement for an energy statement to include a detailed appraisal of the feasibility of provision or connection to low carbon heat networks, as outlined in paragraphs 4.53 and 4.54, is particularly burdensome for large-scale developments.	The guidance in Paragraphs 4.53 and 4.54 of the SPD are aligned with LPDMP Policy D16 (3) which has been subject to a full viability assessment and public examination where the plan as a whole was found to be sound. This requirement has been in place since the LPSS was adopted in 2019 and has been successfully implemented.
	BPL recognises and supports the ambition for new proposed development to promote sustainable design principles; however, it is unclear how many of these principles can all be met and accommodated. It should be recognised within the SPD that while this guidance should be taken into account, a degree of flexibility should be in place to give BPL the best opportunity to meeting GBC's objectives and goals.	The measures in the SPD are aligned with the provisions in Local Plan policy. The Local Plan: Strategy and Sites and the Local Plan: Development Management Policies have been subject to full viability assessments and public examinations where viability was considered. The plans as a whole were found to be viable. The development plan is to be read as a whole, and applications will be assessed on a case-by-case basis.

Other Respondents

Section / paragraph	Comment	GBC response
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	Climate change does not exist/is unproven.	National policy and legislation require the Council to take the issue of climate change seriously and to address it through planning policy.
	The measures within the SPD do not appear to have been costed, there is no Technical Annex setting out the costs, benefits and risks.	The measures in the SPD are aligned with the provisions in Local Plan policy. The Local Plan: Strategy and Sites and the Local Plan: Development Management Policies have been subject to full viability assessments and public examinations where viability was considered. The plans as a whole were found to be viable.
	The document should be deferred until Government policy is clearer.	The SPD provides additional guidance to adopted policy. If the updated Local Plan includes new/amended policies in response to changes to Government policy, then the SPD can be updated accordingly to reflect these changes.
	The SPD should not be done at a Guildford level, instead it should be part of a co-ordinated local authority approach.	Presently, in England there is no strategic planning system to enable a co-ordinated local authority approach, except in areas with elected mayors. The SPD provides additional guidance to adopted policies in the Guildford Local Plan, other boroughs may not have the same planning policy basis in place.
	Mechanical cooling (i.e. air conditioning) should not be discouraged as passive cooling will not work as the climate get warmer and more humid.	In respect to overheating, the SPD provides additional guidance to LPDMP Policies D15 (1a and 1b). The Local Plan policy aligns with 2021 Building Regulations Part O.
	There needs to be a smaller, separate section for small development e.g. extensions.	Some of the guidance in the SPD applies to extensions. While there is no separate section for extensions, householder developments can complete

		the Climate Change Questionnaire and this refers back to the relevant parts of the SPD.
	The full name of acronyms needs to be set out at the start as well as being in the glossary. Glossary needs considerable expansion.	The full name of acronyms is already set out when used for the first time. We have reviewed the glossary to ensure all technical terms and acronyms are captured.
	Where the requirements are identical to building regulations they should not be set out in this document as a planning matter.	There are elements where Policy overlaps with Building Regulations. In most cases, the planning requirement goes further than building regulations, but where it is the same it is because there is adopted policy that is now the same as Building Regulations, and the SPD must align with adopted policy.
4.72	The COP of heat pumps is typically 3 and not the 4 stated in the document.	This point is noted. When heating systems are well-designed (e.g. to a low flow temperature in a well-insulated house), efficiencies increase and can often exceed a COP of 4. The guidance does caveat “when the heating system is well-designed”.
	The SPD should state that solar panels on rooves are not the best solution.	It is assumed this comment refers to viability / return on investment. The Council considers that the SPD does not need to address this.
4.16	Is there any evidence that heat pumps are the most common choice?	The text in Paragraph 4.16 and 4.68 has been amended to refer to new buildings in Guildford Borough. The basis of the statement is from monitoring planning applications for new buildings across the borough.
4.18	In conflict with building regulations.	The Council does not agree that wastewater heat recovery conflicts with 2021 Building Regulations

		Part L, as the building regulations allow such measures.
4.20	Where a building is connected to a district heating system, there can be little reasonable necessity to demonstrate a later fitting of a heat pump.	Paragraph 4.20 is aimed at developments that propose to use gas-fuelled boiler systems, and not connect to a district heating system. Paragraph 4.17 has been amended to make this clearer.
4.22	A constraint on maximising roof coverage of solar panels should be the appearance in the neighbourhood.	The development plan is to be read as a whole, the LPDMP contains various policies to achieve high quality design and protect sensitive areas, including Heritage Assets and the natural environment.
4.30	[Regarding the performance gap] This looks largely to be a Building Regulations matter and not for Planning.	It is well established there is a large performance gap in the UK construction industry. Paragraph 4.30 provides measures the Council would strongly support applicants using to close the performance gap. The NPPF requires the planning system to deliver radical reductions in carbon emissions, and closing the performance gap will assist that task.
4.31	[Regarding prioritising energy demand reduction] Presumably an add-on to Building Regulations, in which case there should be a cost-benefit analysis.	LPDMP Policy D16 (4) is in accordance with 2021 Building Regulations Part L.
4.38	[Regarding the text describing the change in emission factors] Is it wise to "nonsense" the Building Regulations? Planning Inspectors are expected to support Ministerial policy.	Paragraph 4.38 factually sets out how the value for emission factors have changed since the previous (2013) Building Regulations Part L. The text does not criticise the building regulations.
4.64	There is no way decision makers in the UK can be sure the building occupants will use the proposed technologies.	Paragraph 4.64 means that the proposed energy technologies must have the ability and capacity to meet all or most of the needs of the occupants and in

		these circumstances it is likely that the vast majority of occupants will use those systems.
4.65	[Regarding the use of real world emissions data rather than SAP emission factors] The requirement to provide two separate calculations covering the same matter will be seen as bureaucratic. It itself should be justified by a cost-benefit calculation.	No additional calculation is required, though some applications do provide specific figures to support their choice of low carbon technology. An additional calculation is encouraged as a way to communicate the effectiveness of the energy technology favoured by an applicant.
5.3	Here there is external justification for adopting the highest water efficiency standard of 110 L per day, as Guildford is in an area of water shortage stress as defined by Thames Water and confirmed by the Government. Strange that this draft does not mention this?	Paragraph 5.3 sets out the policy requirements. The 110 litres per occupant per day standard was introduced in 2019 through LPSS Policy D2 (1d), where the policy requires water efficiency in new development to meet the highest national standard in response to the 'serious water stress' designation. A reference to the water stress designation has been added at 5.44.
5.7	It is exceedingly difficult to optimise both Solar Gain and Overheating limitation without extravagant control gear. I wonder whether this paragraph should be elaborated to show how this is achieved?	On a building level it is possible to optimise solar gain / natural light and balance this against overheating through good design. The guidance in Section 5 of the SPD suggests a number of measures including internal layout, eaves height and depth, brise soleil and external shuttering.
5.37	Self generated electricity is, by and large, no more efficient used at source than exporting to the Grid and drawing back from the Grid as required.	The National Grid state approximately 6% of the electricity that enters the distribution network will not reach the end-consumer due to transmission losses. The losses for self-generated energy are generally lower, typically around 2%.

5.39	Advice obviously needed on size of recycling containers. Meanwhile, this requirement appears premature.	The requirement is in accordance with adopted LPSS Policy D2 (1e). The SPD must reflect adopted policy.
5.48	As the calculator is required under B Regs, this should presumably cross-refer. As this would appear to be the same document, the clause might say that it will suffice.	The worksheet referenced in Paragraph 5.48 is the 2015 Building Regulations Part G worksheet. The reference to “water efficiency calculator for new dwellings” makes it clear it is the same document. Under national building regulations a condition is required to trigger the stronger water efficiency standard, and under national legislation the condition must require some event or submission so that it can be enforceable. The simplest requirement for the planning condition is the submission of the worksheet.
5.67	Recycled aggregates are something of a risk.	The standards for the safe management and reuse of waste, including aggregates, is set out in other legislation such as the Environmental Protection Act 1990. Waste carriers must have licences and declare they will deal with waste in accordance with the Waste Duty of Care. The use of aggregates in construction is both commonplace and subject to a separate safety regime.
6.12 (f)	The possibility of community ownership obviously needs to be noted, but it is not just the environmental issues that, as here, need information and consideration. There are inherent financial and organisational risks for the Local Authority, and they, presumably, will need to be considered in depth. However, are these Planning matters?	Financial risk would be the responsibility of the individual or organisation that brings forwards a scheme for renewable / low carbon energy and/or storage.

	Further reading / bibliography should be included.	Various links to other useful documents are provided through the SPD guidance in both the main text and footnotes.
	There needs to be an upfront statement that 'Reuse and repurposing existing buildings and infrastructure is the preferred option, Any demolition will need strong sustainability justification'.	Paragraphs 5.83 to 5.91 set out the Council's approach to demolition; that buildings are a resource and their reuse is encouraged. If demolition is considered necessary, then the guidance ensures there is a strong justification for this and that a highly sustainable building replaces the demolished one. As a result, the Council does not consider it necessary to add further guidance.
	It's not my area of expertise, but I found nothing amiss from this quick skim. So while I can't endorse it should others more expert than I find things wrong, I can say that personally I'm happy with what I've seen.	Noted.
	The document needs to be updated to take account of the Supreme Court Ruling JUDGMENT R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) before Lord Kitchin, Lord Sales, Lord Leggatt, Lady Rose, Lord Richards JUDGMENT GIVEN ON 20 June 2024 Gas-based heating should not be allowed at all on new buildings. So this needs updating on p 10 the Energy hierarchy, and sections 4.17 and 4.20 as well as other relevant sections	The Finch judgement does not prohibit the installation of gas-fuelled systems in buildings. LPSS Policy D2 (2) and the guidance in the SPD require applicants to demonstrate compliance with the energy hierarchy by providing a strong justification for the use of gas-fuelled boiler systems. It would be beyond the scope of an SPD to go beyond adopted Local Plan policy and prohibit gas-fuelled boiler systems in all circumstances.
	All new developments should include Segregated Cycle Lanes, and not just cycle lanes separated from roads by only a painted white line.	This is outside the scope of the SPD. Local Transport Note 1/20 sets out the standards for appropriate cycle space.