



*Basingstoke
and Deane*



Basingstoke and Deane Borough Council

Draft Design and Sustainability SPD

Public Consultation Statement of Compliance

February 2008

Introduction

- 1.1 In line with the Planning and Compulsory Purchase Act 2004 Regulations and Planning Policy Statement 12 (PPS12) 'Creating Local Development Frameworks', the Council is required to prepare a Statement of Compliance upon the submission of each Local Development Document (LDD).
- 1.2 The Statement of Compliance states how the arrangements for public consultation have met the requirements of both the Regulations and the Council's Submission Draft Statement of Community Involvement (SCI) (which has recently been examined and found to be 'sound' by the Planning Inspectorate).
- 1.3 The SCI sets out the Council's proposed standards in relation to informing and consulting the community in preparation of all Local Development Documents. It aims to ensure that all sections of the community and other interested parties have the opportunity to get involved from the earliest stages of planning policy preparation.
- 1.4 This draft Statement of Compliance sets out details of public consultation undertaken by the Council in the preparation of the Draft Design and Sustainability Supplementary Planning Document (SPD). It sets out:
 - i) the names of any person who the authority has consulted in connection with the Draft Design and Sustainability SPD
 - ii) how these persons were consulted
 - iii) a summary of the main issues raised in the consultations
 - iv) how the issues raised have been addressed within the draft SPD

Background to the Draft Design and Sustainability SPD

- 2.1 The Draft Design and Sustainability SPD aims to ensure that new development in the Borough is designed and constructed in order to ensure that it responds to its local context in order to provide a high quality built environment and that it minimises the impact on the environment. This is particularly key at present, in the context of climate change and the need to reduce the impact of new development on the natural environment.
- 2.2 The draft SPD provides additional guidance to supplement policies in the Adopted Basingstoke and Deane Local Plan (1996-2011). In particular, it supports policy E1 (Development Control) and will assist with policy implementation through ensuring developers and other interested parties understand how to achieve high quality design which minimises the impact on the environment.

Who will be consulted on the Draft SPD and Sustainability Appraisal

- 3.1 Basingstoke and Deane's Submission Draft SCI sets out a list of statutory bodies specified by the Regulations and Government Guidance, that should be consulted in the preparation of LDDs.
- 3.2 Consultation on the Draft Design and Sustainability SPD and SA will include the following:
- Specific consultation bodies which includes the statutory consultees, Government Agencies, adjacent local authorities and utilities
 - Town and Parish Councils
 - The Home Builders Federation and Building Research Establishment
 - Local stakeholders, including the Village Design Groups and Basingstoke Heritage Society
 - Those who responded to the Issues and Options consultation on the Draft SPD
 - The Climate Change Panel
 - Elected Members and Council officers.
- 3.3 Formal public consultation on the Draft Design and Sustainability SPD and SA is proposed to take place during February / March / April 2008. Copies of the draft SPD and SA will be made available for public inspection at the following locations:
- Basingstoke and Deane Borough Council Offices, Parklands Reception, Civic Offices, London Road, Basingstoke
 - Basingstoke Library, 19/20 Westminster House, Festival Place, Basingstoke
 - Chineham Library, Chineham District Centre, Chineham, Basingstoke
 - Kingsclere Library, The Village Club, George Street, Kingsclere
 - Overton Library, High Street, Overton
 - South Ham Library, Paddock Road, South Ham, Basingstoke
 - Tadley Library, Mulfords Hill, Tadley
 - Whitchurch Library, Bell Street.
- 3.4 A copy of the draft SPD and SA will also be made available on the Council's website at:
www.basingstoke.gov.uk/planning/localplan/spd/Design+and+Sustainability+SPD.htm

3.5 A formal notice of public consultation will also be published in the following local newspapers:

- Basingstoke Gazette
- Andover Advertiser
- Newbury Weekly News

Initial Consultation

4.1 Previous consultation on the emerging Design and Sustainability SPD and SA has included the following:

- i) Consultation on the Scoping Report for the Sustainability Appraisal
- ii) Consultation on the Issues and Options

4.2 Both the SA Scoping Report and the Issues and Options were available for public consultation between 5 January 2007 and 16 February 2007.

SA Scoping Report

4.3 The Scoping Report forms the first stage in the production of the SA for the Design and Sustainability SPD. The SA provides an assessment of the economic, social and environmental effects that are likely to arise from the implementation of the SPD.

4.4 The aim of the Scoping Report is to ensure that the relevant sustainability issues are considered in the production of the draft SPD.

4.5 The Scoping Report was sent to the three statutory consultees (English Heritage, Environment Agency and Natural England) and key local stakeholders. Responses were received from the Environment Agency and Natural England and a summary of their comments is provided below, in addition to any changes made as a result.

Environment Agency

4.6 The Environment Agency (EA) suggested the inclusion of several further documents, including both national guidance and their own publications in respect of groundwater protection, which have now been included within the draft SA. In addition the EA made specific comments in respect of the baseline indicators, the sustainability issues and the SA objectives, all of which related to water quality, land contamination and flood risk, and which have been taken into account in preparing the draft SA.

Natural England

- 4.7 Natural England welcomed the production of the SA and noted that SAs are an important element of the new approach to planning and will help better integration of sustainability issues during the preparation of other documents.

Issues and Options

- 4.8 The Issues and Options paper for the emerging Design and Sustainability SPD sought to clarify a number of important issues, including:
- the scope of the proposed SPD
 - the degree of detail to be included within it
 - how to make better use of land / materials
 - what elements of design should be covered
 - should existing design guides prepared by the Council be updated and attached
 - what forms of renewable energy to include
 - the inclusion of specific targets / thresholds
 - how assessments should be undertaken
- 4.9 During the consultation period, a total of 32 responses were received, including 3 responses from other Business Units within the Council. Of the 29 external responses received, these consisted of Parish and Town Councils, statutory consultees, utility companies, environmental groups, developers / agents and private individuals.
- 4.10 The table below sets out details of those who responded and provides a reference number for each. This reference number is referred to in the subsequent tables which are based around the issues and questions raised in the Issues and Options document which was published in January 2007.

Reference Number	Name / Organisation
(1)	Internal response – not included
(2)	Internal response – not included
3	Tadley Town Council
4	Newnham Parish Council
5	Thames Water
6	Network Rail
7	C Kauntze-Cockburn
8	Southern Water
9	RPS Planning and Development
10	Monk Sherborne Parish Council
11	Silchester Parish Council
12	Hampshire County Council – Minerals and Waste Team
13	Charles Planning Associates (on behalf of Antler Homes Wessex Limited)
14	Baughurst Parish Council
15	Oakley and Deane Parish Council
16	East Woodhay Parish Council
17	North Waltham Parish Council
18	Hampshire County Council – Estates Department
(19)	Internal response – not included
20	Heather Rainbow
21	CTC
22	CBRE CB Richard Ellis
23	Basingstoke Alternative Action Group
24	Natural England
25	Sherfield-on-Loddon Parish Council
26	Countrywatch
27	Basingstoke Friends of Earth
28	Old Basing Parish Council
29	Hurstbourne Priors Parish Council
(30)	Internal response – not included
31	Environment Agency
32	Mapledurwell and Up Nately Parish Council

Resp no	Comment	Officer response
Issue 1 – Is SPD needed? Which option do you prefer and why?		
7, 17, 18, 21, 23	Prefer option of a formal document (rather than advice on a case by case basis) to give weight, provide consistency and keep all the info in one place.	Noted
3	Support option (i)	Noted
4	Needed for consistency and clarity	Noted. It is intended that the draft SPD will be written to ensure clarity and aid understanding
10	Option (i) preferred as case by case assessment too open to interpretation and inconsistency; and less likely to support the achievement of objectives.	Noted
11	Design guidance very helpful as alternative is for developers to present numerous unacceptable proposals.	Noted
13	A formal SPD will provide a clear approach to design issues. However, it is essential that officers / Members are aware of content and status in relation to DC, ie it remains supplementary to policies in Local Plan. SPD will not be directly applicable to all circumstances and officers / Members should be aware that its advice isn't always of relevance.	Noted. However, an adopted SPD is a material consideration and it will be necessary to take its content into account in determining any planning applications.
14	option (ii) - allows for individuality in certain situations	Noted. However, it is felt that there is an over-riding need to ensure consistency
15	(i) case by case is unworkable	Noted
16	(i) Need to provide support to policy to aid interpretation, but qualified as subject to modification at any point in time in the light of changes in PPS documents	Noted
20	Support option i. Advice on environmental design is changing rapidly and is complex, so SPDs allow issues to be better understood by those applying for planning permission. The main document should provide the principles and point to further sources for best practice.	Noted. It is intended that the SPD has been written such that it sets out the basic principles of design and sustainability and refers to other documents for detail.
22	There may not be a need for an SPD on Design and Sustainability. It may be difficult to cover all of the issues relevant to design and sustainability in one document. As every development is different, it may be more appropriate to provide advice on a case by case basis.	Noted. It is acknowledged that the scope of the proposed SPD will be wide. However, it is considered to be vital that all of this info is set out in an up-to-date adopted document.
24	Welcome the production of the SPD – will be an efficient way of helping to ensure the sustainability objectives are met.	Noted
25	(i) formal SPD because local towns and villages will have their own opinions.	Noted
26	(i) will provide clear and consistent advice and will be a material consideration. A reference section would reduce the size of the main document.	Noted. It is intended that the document will rely on referenced documents.
27	(i) guidance needs to be consistent and a formal SPD is more likely to carry weight	Noted
28	Better that guidance is available in advance to save time and ensure consistency / transparency.	Noted

Resp no	Comment	Officer response
29, 32	Support option i) to provide a standard and consistency which has been absent from decisions applied in this parish. Also less scope for misinterpretation.	Noted
31	A formal document would be the better option. Although possibly becoming outdated, will add significant weight to sustainable development. The SPD should be a live document allowing for the replacement of older criteria with future good practice.	Noted
Issue 1 – Is SPD needed?		
Is there an alternative option which would result in a degree of consistency across the Borough?		
4	I doubt it.	Noted
7	To remove all village SPBs, thus providing proper protection to rural villages. Development to be concentrated in true brownfield sites, not just by reclassifying rural gardens.	Noted. However, this is not within the scope of this SPD and will be addressed in other documents in the LDF.
16	(i) Need to provide support to policy to aid interpretation, but qualified as subject to modification at any point in time in the light of changes in PPS documents	Noted
23	There does not appear to be an alternative version that could be applied consistently	Noted
25	No, because towns and villages will have their own opinions.	Noted
26	(ii) should be used as a matter of course when consulting with applicants on a case by case basis.	Noted
28	No	Noted
29, 32	Application of common sense and proper local consultation by officers, in considering the comments of parish councils which are best placed to understand local circumstances.	Noted. All comments received are given full consideration by officers and responses are reported to elected Members.
Issue 1 – Is SPD needed?		
Is it feasible to cover all design and sustainability issues in one document?		
4, 17	It should be - need to use plain English and avoid being 'wordy' and be clearly indexed.	Noted
7	Yes	Noted
10	There are a number of related documents and policies which could supplement the SPD. These would not need to be replicated in the SPD but could be referenced with only the specific context of how they apply to the SPD included in the main document.	Noted. The proposed SPD has been drafted in this manner.
13	Range of issues could be better addressed through a compendium approach rather than one single document. This would enable a series of volumes to be prepared which would together comprise the SPD, but individually relate to specific areas (eg householder, major devt, sustainable construction)	Noted. The proposed draft SPD will provide an overall framework and the supporting documents which sit beneath this will provide the detail.
14	Yes, a good idea providing the indices are readable and understandable.	Noted
16	Probably not, but the supporting documents should be published as sub-documents of an overall SPD so that they are read in this context with appropriate cross references.	Noted
18	Support separation of design from sustainability, as these require significant coverage and may create an over long document. Also it may need to be updated independently, with sustainability being updated more often as it is an evolving field.	Noted. However, it is considered that the issues of design and sustainability are so closely linked that they should be considered in one document, applicable to all development.
21	It is not possible to cover all transport issues in one document. An SPD would need to	Noted. The SPD has been drafted to provide references to

Resp no	Comment	Officer response
	give an overview of transport infrastructure principles and philosophy with full references to more detailed documents. In addition a document giving examples of good and bad practice in the Borough or Hampshire would be very helpful.	more detailed documents, and it is intended to update references to ensure that they do not become dated.
23	Yes, it is feasible to cover the issues and options in an understandable format by referring to supporting documents	Noted
25	No, as local towns and villages will have their own opinions	Noted. The SPD has been drafted to allow for consideration of local issues.
26	No, however, it should be possible to produce an SPD that covers all the main issues and refers to an appendix or other documents to provide guidance in more detail.	Noted
28	Yes. Your outline document goes a long way to achieve this.	Noted
31	It should be possible to cover the key sustainability issues in one document, but this depends on scope of the term sustainability. Note that a separate document has been produced covering landscape and biodiversity which could have formed part of this document. The separation of these issues will make the document easier to produce and use.	Noted
Issue 2 – Making better use of land		
Category A – efficient use of land / character issues?		
3, 4, 7, 10, 28, 29	(i) To ensure consistency	Noted
13	SPD should include guidance in relation to the objective of making better use of urban land. However, this should reflect PPS3 and not be overly restrictive.	Noted. The draft SPD makes reference to the advice in PPS3.
14	(ii) each case is individual and should be assessed on merit	Noted. However, it is necessary to ensure a degree of consistency.
15	Guidance needed on A	Noted. It is intended that further guidance on this will be provided in a supporting document alongside the SPD.
16	(ii) If policy E1 is followed, there should be no need for specific guidance, other than VDSs in the case of rural areas. PPS3 does not imply that all developments should achieve or exceed 30 dwellings per hectare.	Noted
17	(i) To ensure the use of brownfield sites and minimise greenfield sites	Noted
18	(i) is preferred as guidance provides greater consistency – support useful guidance as long as it recognises that the character of some areas is responsible for poor sustainability, and that it may not be appropriate to replicate the ‘character’ of some areas, rather to encourage development with more sustainable characteristics in urban design terms. It would also be helpful if the guidance recognised that larger infill or edge developments may have the potential to create their own character.	Noted. The various design guides and appraisals are tools that are used as a part of the decision making process. Other considerations will be taken into account, including sustainability and renewable energy proposals.
23	All 3 options as these are equally important	Noted
24	Support the production of guidance to help ensure the efficient use of land and respect the land’s character	Noted
25	A(i) because over-crowding can create as many problems as it solves.	Noted

Resp no	Comment	Officer response
26	A(i) clear and consistent advice is required on the efficient use of land but that higher densities should be respectful of the area's character	Noted
28	A(i) Better that guidance is available in advance to save time and ensure consistency and transparency.	Noted
32	Support Ai) Area's character is very important. Need to enhance or support, not detract.	Noted
Issue 2 – Making better use of land		
Category B – Guidance on sub-division of dwellings		
3, 4, 7, 10, 14, 15, 17, 26, 28, 29, 32	(i) For clarity and consistency and to provide a framework for the assessment of cases, which would include the implications of sub-division proposals.	Noted. It is intended that further guidance will be provided on sub-divisions in a supporting document to the SPD.
23	All 3 options as these are equally important	Noted
Issue 2 – Making better use of land		
Category C – Guidance on tall buildings?		
3, 4, 7	(i) For clarity and consistency	Noted
10	(i) a city-scape skyline emerging from the essentially rural environment is inappropriate. Height restrictions and control would be important to avoid over-height buildings from being visible from rural areas and on the approach to and past the town from trunk roads which would create a negative landmark and poor general perception of the area.	Noted. The proposed SPD has been drafted to identify some of the key issues associated with tall buildings, together with references to more detailed guidance.
14	(i) Tall buildings should only be permitted (under guidelines) in urban areas	Noted
17	(ii) difficult to establish meaningful guidance as the impact of the building's height is dependent on its environment	Noted. The provision of general guidance on the key issues will ensure that account is taken of the local environment.
18	(i) Would support guidance that sets out how to create greater identity to existing and new neighbourhoods at different scales and levels. The guidance should recognise that height can have a positive visual impact. It would also be beneficial if the guidance recognised that perceived height can differ from actual height, and that simplistic requirements to replicate storey heights of an existing area may limit opportunities unnecessarily. It may therefore be more beneficial to concentrate the guidance on spatial definition rather than height.	Noted. The proposed SPD has been drafted to identify some of the key issues associated with tall buildings, together with references to more detailed guidance.
23	All 3 options are equally important	Noted
26	C(i) Clear and consistent advice is required and that the visual and environmental affect of tall buildings will be assessed by the LPA.	Noted. The proposed SPD has been drafted to reflect this.
28	C(i) Better that guidance is available in advance to save time and ensure consistency and transparency.	Noted
29	Support option Ci) if, as we believe, tall buildings do not always improve the view and environment.	Noted
32	Support Ci) Need to keep developments under control.	Noted
Issue 2 – Making better use of land?		
Question 2 – Should all schemes be built to 30 dwellings per hectare?		

Resp no	Comment	Officer response
3, 4, 7, 10, 11	There should be scope to be more flexible to suit local characteristics	Noted. It is proposed that the detailed guidance which will sit within the framework of the SPD will provide advice in respect of density, in the context of character appraisals, such as the Urban Character Study for Basingstoke and the VDS documents.
13	PPS3 is clear on 30 dwellings per hectare and LPAs should aim to achieve this where practicable. However, this is a guide until local density policies are in place. Should LPAs wish to plan for lower densities, this will need to be justified through the advice in PPS3. Borough should aim for 30dph, with flexibility to respond to individual circumstances.	Noted. Through the use of the Urban Character Study for Basingstoke and the various VDS documents, it is intended that account will be taken of local circumstances. However, the density guidance in PPS3 will also be a key consideration.
14	More scope allowed, particularly in rural areas	Noted
15	Density decided by split of housing type	Noted
16	Be more flexible – if PPS3 is followed there should be no need for specific guidance other than VDSs in the case of rural areas. PPS3 does not imply that all developments should achieve or exceed 30 dwellings per hectare.	Noted. Through the use of the Urban Character Study for Basingstoke and the various VDS documents, it is intended that account will be taken of local circumstances. However, the density guidance in PPS3 will also be a key consideration.
17	Need to retain flexibility and building density	Noted.
18	We would support guidance that sets out a general rule to achieve a minimum of 30dph, with the option for exceptions to this, but with the onus on the developer to prove why 30dph is unachievable, before such exceptions are considered.	Noted. Through the use of the Urban Character Study for Basingstoke and the various VDS documents, it is intended that account will be taken of local circumstances. However, the density guidance in PPS3 will also be a key consideration.
23	There should be scope to be flexible especially when constrained by infrastructure.	Noted. There may be a need to include a degree of flexibility. However, the onus will be on the developer to demonstrate why suitable densities are not being achieved.
25	No, because the basic infrastructure is already under pressure and needs to be considered first of all	Noted. The infrastructure needs of a development will always be taken into account through the planning process and appropriate improvements will be sought where they are needed to meet the additional needs of new development.
26, 28	There should be more scope to be more flexible to reflect local character especially on sites of less than 1 hectare and ‘back garden’ sites.	Noted. Through the use of the Urban Character Study for Basingstoke and the VDS documents, it is intended that local character will be taken into account.
29	Keep developers on as tight a leash as possible.	Noted
32	Need scope for local characteristics. Inappropriate densities could severely change an area.	Noted. This is the approach that is proposed through the use of the Urban Character Study and the various VDS documents.
Issue 2 – Making better use of land?		

Resp no	Comment	Officer response
Question 3 – Further guidance on achieving high quality developments at an appropriate density?		
4	The question is not clear, but probably	Noted
7	No	Noted
10	No familiarity with the existing guidance on this, so cannot comment	Noted
11	Yes	Noted
13	Any guidance relating to density should be prepared in accordance with PPS3 paras 45-51. This seeks to encourage locally derived assessment of density where necessary and appropriate, providing the approach remains flexible and accords with objective of making best use of urban land / buildings in sustainable locations.	Noted. The proposed SPD and linked documents take into account the advice in PPS3 and other Government guidance.
14	No, not convinced that this would have the desired effect	Noted
16	No take each application in relation to its particular situation	Noted. However, it is considered that there is a need for consistency across the Borough.
17	Yes, VDS and Urban Character Study of Basingstoke	Noted
18	Describing the character of existing areas, unless they have special qualities that should be protected (and are recognised through a designation) is not necessarily useful or helpful as it may imply that the character should be replicated. New developments should always involve appraisals of the context (as set out by national guidance) and should be more specific and relevant than area descriptions of character. If Character Studies are undertaken, care should be taken not to use them to replicate unsustainable forms of development, as many existing forms of development in Basingstoke have issues of unsustainable layouts, indefensible space and car dependent living.	Noted. Any design guides / appraisals will be considered as a part of the DC process. However, account will be taken of the national planning advice in order that the most appropriate proposals are permitted.
23	There should be additional guidance on conservation areas, heritage sites, AONBs etc.	Noted. Detailed advice is already provided on conservation areas and the AONB through the appraisal documents and management plan.
25	Not until the basic infrastructure requirements are met.	Noted
26	VDSs and the Urban Character Study should provide guidance but further guidance should be provided for areas not covered by these.	Noted. It is proposed that the urban Character Study will cover all of the residential areas of the town, whilst conservation areas and VDS documents cover many of the other settlements in the Borough.
28	Yes	Noted
29	Yes, if that guidance is respected and policed.	Noted
31	The environmental issues with increased densities should also be explained including: <ul style="list-style-type: none"> • Less space to manage surface water runoff (potential to increase flood risk) • Taller buildings generally require deeper foundations (possible impacts on groundwater quality) • Potential for remediation of land affected by contamination from its previous use(s) • Taller buildings near watercourses may create shading which will have an adverse affect on biodiversity 	Noted. It is not proposed to include this level of detail in the draft SPD, but to refer to separate advice, which addresses these and other issues.

Resp no	Comment	Officer response
	<ul style="list-style-type: none"> Sub division of units, or higher densities in the floodplain can put additional residents at risk from flooding. <p>With increased densities in the form of flats, it becomes more feasible for incorporation of green roofs (living roofs) which offer many environmental benefits.</p>	
32	Yes, subject to local approval.	Noted
Issue 2 – Making better use of land?		
Question 4 – Guidance on how density will be assessed in light of market needs		
4	No, markets are continually changing	Noted
7	Yes	Noted. However, following investigations, it is considered that market assessments are beyond the scope of the draft SPD and that the market will change too rapidly in order to provide up-to-date information.
10	Market needs along should not be allowed to define or drive these assessments, without consideration of the maintenance of local characteristics or the amenity of the existing population	Noted
13	Should a range of densities be introduced, these must be justified in accordance with the advice in para 46 of PPS3. In relation to housing demand and need, it is vital that the council provides guidance on how this will be gathered and assessed, in order to ensure appropriateness and robustness.	Noted
14	Yes, uniformity would help	Noted
16	No, market needs should not be a reason for planning decisions. This is distinct from need for affordable housing which should relate to local need, eg parish basis.	Noted
18	Would prefer guidance to be given on a site by site basis through pre-application discussions, as this type of guidance should be site specific, accommodate changing needs and enabling flexibility.	Noted. It is not proposed to include market based advice in the draft SPD.
23	Density requirements can be highlighted by, but not driven by, market needs.	Noted
25	Not until the basic infrastructure requirements are met	Noted
26	The Council's housing mix policy should provide guidance. Density requirements should be assessed using this and A(i) B(i) and C(i) above, not market conditions.	Noted
28	Yes. However, market needs should be the least relevant factor. It's not always 'market needs' but 'market want'. This is not always sustainable.	Noted. It is not proposed to include market based advice in the draft SPD.
29	Only if market needs cannot be satisfied elsewhere.	Noted
32	Not at the expense of communities already established.	Noted
Issue 3 – Making better use of homes / buildings		
Question 1 – Is it viable to construct buildings with flexibility to accommodate alternative uses?		
3, 7, 26, 28	Yes	Noted. However, given the difficulties of providing advice to change between uses and the uncertainty around will be needed in the future, no guidance is proposed on this issue.

Resp no	Comment	Officer response
4, 10, 15, 16, 25	Very difficult. How can a designer allow for needs in 10 years? Would be overly complex and have minimal impact	Noted.
11	Not often	Noted.
14	Providing these uses are from the same use classes order eg B1	Noted. However, given the difficulties of providing advice to change between uses and the uncertainty around will be needed in the future, no guidance is proposed on this issue.
17	Significant change in the use of domestic dwelling is not common enough to warrant extra costs in design simply to provide for flexibility. May be realistic in the case of industrial / office / agricultural buildings	Noted
22	It is not viable or realistic to insist that developers construct buildings with the flexibility to accommodate alternative uses. In most cases, where viable, developers will seek to achieve the flexibility to accommodate more than one use in a building. It is up to the developer to assess this potential, not the local authority to insist on a building that is suitable for a number of uses through the planning system.	Noted. Accordingly, such advice has not been provided.
23	Yes, it should be realistic to construct buildings with flexibility to accommodate alternative uses as this is the most sustainable goal.	Noted. However, given the difficulties of providing advice to change between uses and the uncertainty around will be needed in the future, no guidance is proposed on this issue.
24	Supports the provision of as much information as possible to help achieve the sustainable use of materials and buildings	Noted. However, given the difficulties of providing advice to change between uses and the uncertainty around will be needed in the future, no guidance is proposed on this issue.
29	Support option i) in order to prevent abuse by developers.	Noted. However, given the difficulties of providing advice to change between uses and the uncertainty around will be needed in the future, no guidance is proposed on this issue.
31	Buildings designed to be easy to switch use from office to residential should not be constructed in the floodplain. We would not wish to offer false hope to site owners that the change of use of buildings to a higher vulnerability is acceptable in an area liable to flood.	Noted
32	Planning needs to control alternative uses carefully. Flexibility is ok provided it is contained. Cannot allow free rein to unscrupulous developers.	Noted
Issue 3 – Making better use of homes / buildings		
Question 2 – What characteristics would enable buildings to be easily converted?		
4	Home owners have been quite adept at changing their homes to meet their needs – no guidance is needed	Noted
14	Brownfield sites with surplus buildings	Noted
17	One for the architects	Noted
23	Stronger shell / lighter partitioning enables easier conversion	Noted
25	None	Noted
26	Modular construction with means of easily changing or moving modules	Noted
28	Location of bathroom/toilet facilities. Possible extra facilities on ground floor to	Noted

Resp no	Comment	Officer response
	accommodate the elderly and infirm.	
29	Flexible interiors, though residential buildings should not be capable of being converted to other uses so long as the residential market is tight, which seems to be likely for the foreseeable future.	Noted
32	Extensions, attic conversions but anticipated with strong foundations and structures.	Noted
Issue 3 – Making better use of homes / buildings		
Question 3 – To what extent should guidance be offered?		
4	Best guidance would be to recommend use, where possible, of recycled materials and construction (both design and material choice) which would aid recycling at the top end of a building's life	Noted. Given the complexity of the issue and the uncertainty around what will be needed in the future, no guidance is proposed on this issue.
14	Designating sites in the first place	Noted
16	No guidance	Noted
17, 23	Guidance for industrial / office / agricultural and need to comply with the regulations and codes of practice	Noted
26	(i) but restrict advice to re-use for the same purpose eg residential	Noted
28	As far as possible but allowing for flexibility where there is a specific need.	Noted
31	If an approach is adopted to promote buildings which are easy to convert we would wish to see guidance that this would not be acceptable in areas at risk from flooding.	Noted. However, this is beyond the scope of the proposed SPD.
Issue 4 – Making better use of materials		
Question 1 – is the SPD the right place to provide advice on re-use of materials? Does this duplicate advice in the Minerals and Waste Development Framework?		
3	Is this adequately covered by existing documents?	Noted. It is proposed to provide a brief summary in the draft SPD and to provide a link to the HCC Minerals and Waste Development Framework.
4, 10,	Yes, option (i) is the better option to reduce bulk, reference should be made to the relevant documents, such as the minerals and waste development framework, with a short summary of the main points. Do not replicate detail in the SPD.	Noted. This is the approach that has been taken forward in the draft SPD.
7, 14, 23, 24, 25, 26, 27, 28, 29, 31	Yes.	Noted. It is proposed to provide a brief summary in the draft SPD and to provide a link to the HCC Minerals and Waste Development Framework.
13	Not the appropriate place to provide advice on selection, use and reuse of building materials, except where directly relevant to material planning considerations (eg visual amenity). Other issues, such as source of materials are covered through other legislation and regulations and should not be duplicated.	Noted. It is considered that any advice on these matters is better placed in the appraisal documents and used in attaching conditions, where appropriate.
15	No	Noted
16	(ii) Option (i) is too prescriptive	Noted

Resp no	Comment	Officer response
32	Not necessary beyond mentioning existing guidance. Recycled materials should be VAT exempt to encourage use.	Noted
Issue 4 – Making better use of materials		
Question 2 – What level of detail should be provide on re-use of materials		
4, 7, 10, 13	Reference should be made to made to the relevant documents, such as the Minerals and Waste Development Framework, with a short summary of the main points.	Noted. This is the approach that has been taken forward in the draft SPD.
15	Enough already	Noted
16	None	Noted
17	The advice needs to be as detailed as possible, eg refer to specific materials, local sources etc, but must be kept up-to-date	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
23	Detail is needed to comply with regulations affecting onsite works	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
25	As much as is required / needed	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
26	Sufficient to ensure that maximum re-use and local character is achieved	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
27	This would depend on the size of the development. For large developments, a high level of detail should be provided as they will be having a bigger impact in terms of material use. High targets should be set for developers with on site waste segregation compulsory/	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
28	As much as possible allowing for flexibility where there is a specific reason.	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
29	General guidance	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
32	Make it a financial advantage.	Noted. However, this is beyond the scope of the draft SPD.
Issue 4 – Making better use of land		
Question 3 – Should specific information be provided or just general guidance with links to other sources of information?		
3	Specific information should be provided	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
4, 7, 10, 11, 13, 14, 23, 25	General guidance with lines / references to sources of more detailed information	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
20	General guidance with links to sources of detailed information including CAT (Centre for Alternative Technology). Any guidance which is given should not preclude the use of more unusual materials as suggested by this engineering charity or bodies recommended by it.	Noted. The proposed SPD has been drafted to provide a basic summary with links to more detailed information.
26	Specific information including ecohomes standards	Noted. The proposed SPD has been drafted to incorporate references to the Code for Sustainable Homes, which replaces for the previous Eco-Homes standards.

Resp no	Comment	Officer response
27	Specific guidance should be provided. The Council should aim to set developer targets for the reuse and recycling of material on site. There is a good deal of external information available to developers and this is becoming an increasingly important issue in the construction sector. A Hampshire wide policy should be implemented to ensure consistency.	Noted. The proposed SPD has been drafted to provide a basic summary, with links to more detailed information.
28, 29, 32	General guidance with links.	Noted
Issue 5 – Reducing the need to travel by unsustainable modes		
Question 1 – Is there potential overlap with other documents produced by the Council and the highway authority		
3	Is this adequately covered by existing documents?	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
4	Of course! Best approach is to make reference to key points and give references to appropriate documents.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
10, 26	Make reference to other documents and guidance, and how they apply to the SPD but do not replicate the detail in the SPD	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
13	Yes, the HCC's MASS document sets out highways advice, and Govt's new DB32 is likely to be published in March 2007, superseding MASS. On this basis, adequate guidance either already exists or will be published shortly, and its not therefore necessary to repeat	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
14	No	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
15, 17	Yes	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
16	Option (ii) avoids replications	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
18	Support a progressive, joined up approach that incorporates good urban design and sustainability principles in a single transport focussed document, that addresses the Manual for Streets guidance to be published in March 2007.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
20	Endorse everything said by the CTC. When selling houses, developers should be encouraged to describe the walking and cycling options as well as the usual car based ones.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
21	Preferred option is to produce a relatively brief overview with full references and supporting documents. This is particularly important with respect to cycling as most engineers have never received training in designing highways, cycle paths etc. Cycle	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides. In addition, HCC's cycle parking standards provide

Resp no	Comment	Officer response
	Friendly Infrastructure (CFI) published in 1996 is still as relevant and as up to date to-day as when it was first published, but how many have seen it. It is not just the road infrastructure that is important. Fear of theft is going to deter many from taking the bicycle so there must be safe garaging in all homes and at "trip generators". Detailed info. needed to provide attractive cycle storage in right locations.	detailed guidance on what level of cycle parking is necessary for new developments.
22, 23	If this is to be included, the Council should ensure that it does not simply reproduce or over complicate the advice in existing Council documents on accessibility.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
24	Support any measures that promote sustainable travel and reduce the need to travel	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
25	(i) such advice should be provided by the seller, the developer or estate agent.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
27	It is important that detailed advice (or better, requirements) be included in the SPD. In particular encouraging the use of public transport and cycling/walking whenever possible. As well as improving the quality of life (more of a community and healthier people) it also has a significant effect on reducing carbon emissions.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
28	(i) See reply to issue 4. Public transport is a particularly important aspect, particularly in villages. However, it should not be forgotten that you cannot stop people using cars. It's not practical to say no parking areas / restricted areas, it does not work.	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
29	Support option i) but must take account of local circumstances. For example we had an application modification to reduce the number of parking spaces in a development 2 miles from the nearest bus service on the grounds that people should be encouraged to use public transport!	Noted. It is considered that adequate guidance is already provided through the LTP, BEST and the various design guides.
Issue 6 – Design considerations		
Question 1 – Are there any parts of existing design guidance which are particularly useful?		
3, 7, 13, 26, 27, 28	Option (i) – do not rely on existing design guides.	Noted. It is proposed to undertake a review of design guides in order to ensure that they reflect best practice and the latest guidance/
4, 10	No comment	Noted
14	When allied with VDS, helps determine our views on planning applications	Noted. The Borough Council considers VDS documents in determining planning applications.
16	Design Guide 2 - Extensions, BOLI, East Woodhay VDS. Option (i) make reference to relevant authorities / documents to avoid unnecessary duplication of information in the SPD.	Noted.
18	(i) would suggest that it may be beneficial to separate design from sustainability	Noted. However, it is considered to be important to cover the issues of design and sustainability in one document,

Resp no	Comment	Officer response
		given the close links between the two areas.
20	There should not be too slavish adherence to norms and fitting in with traditional styles. It is important that houses with an unusual appearance due to their eco friendly design should not be discouraged. E.g. Houses using passive solar heating can look very different or buildings with “living” roofs with plants on them.	Noted. It is recognised that the incorporation of renewable energy features may mean that the external appearance of buildings may differ from typical designs.
22	The Council already has a significant amount of design guidance available and we agree this should be updated regularly. We are concerned that additional design guidance in the form of proposed SPD may replicate existing guidance resulting in too many documents advising on the same issues and over-complicating the system.	Noted. It is intended that the design guides will be replaced over time in order to provide a comprehensive and easy to use document beneath the SPD.
23	All parts of the design guidance are helpful and should be linked and updated to Central Government regulations and other local authority best practice where appropriate.	Noted
25	(ii) only if consultation between borough and local town / village councils is thorough and agreements are adhered to	Noted. It is proposed to update the existing design guides to ensure that they reflect best practice. This will include consultation with parish and town councils.
29	Only if they are adhered to and applied consistently.	Noted. The guides would be material considerations in the determination of planning applications.
31	We would support the review of the existing design guides. The sections contained within the existing Sustainable Design and Construction Supplementary Planning Guidance are useful allowing easy reference to the relevant sections. We would support a checklist based on an expansion of these headings.	Noted
Issue 6 – Design considerations		
Question 2 – Is there an absence of design guidance on any specific subject?		
4, 10, 24	No comment	Noted
13	No particular absence of design guides	Noted
16	Measures at the design stage to minimise the need to park vehicles on the highway	Noted. Such issues are addressed in the HCC publication ‘MASS’
20	There should not be too slavish adherence to norms and fitting in with traditional styles. It is important that houses with an unusual appearance due to their eco friendly design should not be discouraged. E.g. Houses using passive solar heating can look very different or buildings with “living” roofs with plants on them.	Noted. It is recognised that the incorporation of renewable energy features may mean that the external appearance of buildings may differ from typical designs.
23	Visual design and cultural design guidance needed	Noted. Visual guidance and appraisals of existing areas will be provided to support the SPD.
32	Lack of sensible flexibility e.g. Policies H15 and H16.	Noted. However, these are not policies in a currently adopted plan prepared by the Borough Council.
Issue 7 – Renewable Energy		
Question 1 – Is there any need for guidance on micro-generation?		
2, 3, 14	All renewable energy options should be included in the document to allow choices to be made on their feasibility for each site. Guidance should be included on current technologies with links to other documents to make fact-finding easier.	Noted. The proposed SPD has been drafted to cover all of the main renewable technologies available in summary form, with links to more detailed sources of information.

Resp no	Comment	Officer response
4	There is a need for further guidance, but it should be at option (ii) level. Technology and costs are rapidly changing, the SPD should not be too prescriptive, rather to set objectives, such as the Merton Rule and let developers pick the technology	Noted. The SPD is not prescriptive about which technologies to use and this is left to the discretion of the developer / agent.
10	Yes, to maximise and encourage projects which have a genuine net overall benefit	Noted
11	Not strong enough – should expect to see energy minimisation / water saving on all new construction and micro-generation on larger developments	Noted. The proposed SPD incorporates a requirement for larger developments to meet a certain standard, including level 3 of the Code for Sustainable Homes.
13	In response to all 4 questions, it is prudent for the Council to await the final version of the PPS on Climate Change. It would not be appropriate to prejudge the outcome of the current consultation debate. In any event, any advice should be limited to planning matters. Any issues that are more appropriately addressed through other legislation or regulations, such as building regulations, should not be repeated within a planning policy document.	Noted. However, given the Government's strong views on the issue of climate change and the pressing need to ensure that developments in the Borough are designed to maximise the impact of climate change, it is necessary to proceed with the SPD.
15	Technology of whatever form is moving very rapidly and flexibility in need updating needed	Noted. It is hoped to achieve this by including a summary of the key points and referring to more detailed information.
16, 17	Favour option (iii)	Noted
19	Generally guidance should help provide a framework of what is expected, why and how it can be applied.	Noted
20	It is important that best practice is adopted.	Noted
22	Question whether it is appropriate to set specific targets on the use of energy saving measures and reduction of carbon in a planning document. Technology is advancing rapidly and using different energy saving measures will be different for each development proposal. For example, it may not be physically possible to provide on a new building a sedum roof that assists sustainable drainage as well as solar power panels and a wind turbine. The Borough's guidance on energy saving measures should take the lead from government guidance and set objectives that are not prescriptive but instead promote the consideration of different options.	Noted. However, the draft PPS and Code for Sustainable Homes provide clear guidance on what LPAs should be seeking in new developments and, in so doing, sets out the range of technologies that could be used. It is not prescriptive as to which techniques should be used.
23	There is a need for micro-generation guidance policy (see climate change SIP)	Noted. The Govt is already considering relaxing planning rules with regard to micro-generation and the proposed SPD is generally supportive of measures to introduce such features.
24	Renewable energy is an important part of planning for sustainability and welcome the provision of detailed advice on micro-generation	Noted
25	(ii) only after local consultation	Noted. However, it is considered to be useful to provide a summary of all the main forms of renewable energy.
26	Yes, energy conservation, renewable sources of energy generation and reduction of carbon footprint must be a major feature in this SPD. Support option (i)	Noted
27	(i) Yes, details of all the key sources of micro-generation should be included. If we're going to be serious about tackling climate change at the local level, then a Merton + rule	Noted. The draft proposed SPD includes a requirement for larger developments to meet level 3 of the Code for

Resp no	Comment	Officer response
	has to be applied – eg all new developments have to have 20-30% of their energy generated by renewables. Use of CHP has to strongly be encouraged for similar reasons (and extra credit will be given to developers for this).	Sustainable Homes / very good BREEAM standards. These involve significant reductions in CO2 emissions compared to the Building Regulations.
28	(iii) Don't know enough to comment.	Noted
29	Yes, anything which will encourage reduced energy consumption / alternative green means of generating energy.	Noted
32	Yes.	Noted
Issue 7 – Renewable Energy Question 2 – If the SPD is to selective in its coverage of micro-generation, what areas should it concentrate on?		
2, 4	All renewable energy options should be included in the document to allow choices to be made on their feasibility for each site. Guidance should be included on current technologies with links to other documents to make fact-finding easier.	Noted
10	No comment	Noted
13	In response to all 4 questions, it is prudent for the Council to await the final version of the PPS on Climate Change, prior to considering the inclusion of any guidance of these matters. It would not be appropriate to prejudge the outcome of the current consultation debate. In any event, any advice should be limited to planning matters. Any issues that are more appropriately addressed through other legislation or regulations, such as building regulations, should not be repeated within a planning policy document.	Noted. However, given the Government's strong views on the issue of climate change and the pressing need to ensure that developments in the Borough are designed to maximise the impact of climate change, it is necessary to proceed with the SPD.
14	Wind and solar power and greywater recycling	Noted
17	Solar panels are less intrusive to the environment than wind turbines	Noted
20	It is important that the SPD provides outline guidance on all of the key sources of micro-generation including wind, solar power and CHP, outlining the benefits and the main considerations of each. Some details also would be helpful when comparing say different types of solar heating and also different energy storage methods. It is essential to provide linked documents, web pages etc. Water power is another method which has not been included.	Noted. The SPD has been drafted to incorporate all of the main sources of renewable energy, with links to best practice guidance.
23	SPD should comprehensively cover micro-generation	Noted
27	If it has to be selective, then it should concentrate on those modes of energy generation that have a good pay-back time and reduce carbon dioxide output significantly (eg CHP and solar heating)	Noted
29	The cleanest.	Noted
Issue 7 – Renewable Energy Question 3 – Are there any characteristics of micro-generation which need special consideration?		
4	Environmental impact should be monitored and environmental impact assessment must be considered	Noted. This is something that will be considered in taking forward and implementing the SPD.
10	The net total life impact ad the impact to neighbours and the local environment	Noted. This is something that will be considered in taking forward and implementing the SPD.

Resp no	Comment	Officer response
23	No particular micro-generation forms need special consideration	Noted
26	Each site has different characteristics. Consideration of the most suitable source of energy generation will vary from site to site. SPD should detail the different types of micro-generation available and considerations to be taken into account before utilising the chosen form.	Noted. The SPD has been drafted such that it is not prescriptive as to which technologies should be implemented.
27	CHP should be standard in most significant sized new developments. CHP is not necessarily renewable (most CHP plants are gas fired) but the energy efficiencies achievable are very high (up to 90%). Examples are already working, eg Woking, Southampton, Portsmouth.	Noted. The potential for CHP will be considered as a part of the Core Strategy DPD.
28	Don't know enough to comment.	Noted
Issue 7 – Renewable Energy		
Question 4 – Are there any other forms of micro-generation to be included?		
Issue 8 – Water use and efficiency		
Which option do you support – (i) provision of guidance on water conservation or (ii) no guidance?		
2	As much guidance and information as possible should be provided	Noted
3, 7, 8, 10, 15, 19	(i) Including use of water butts, low water usage appliances etc	Noted. Guidance has been provided on SUDS and green roofs, in addition to requiring that level 3 of the Code for Sustainable Homes be achieved, which requires that certain levels of water usage be achieved.
4	(i) We need to get the message clearly across that we need to conserve water resources and reduce the consequent sewerage load.	Noted. The Council is working closely with the water suppliers and the Env't Agency to ensure that these issues are considered.
5	Generally support this section as Thames support and promote the efficient use of water and the recognition of it as a precious natural resource.	Noted
11	Not strong enough – should expect to see energy minimisation / water saving on all new construction and micro-generation on larger developments	Noted. It is proposed to require new developments to meet level 3 of the Code for Sustainable Homes or BREEAM standards, including water minimisation.
13	Generally supportive of energy conservation and water efficiency, it is wholly inappropriate for the SPD to seek to set out guidance outside of the planning system. Water conservation is set out in the Building Regulations and through taxation, use restrictions and education.	Noted. Guidance has been provided on SUDS and green roofs, in addition to requiring that level 3 of the Code for Sustainable Homes be achieved, which requires that certain levels of water usage be achieved.
14	Imperative with threat of global warming, drought etc.	Noted
17	If guidance is produced (even if it restates guidance from water companies) householders may appreciate that saving water is not simply going to improve the profitability of water companies.	Noted
20	Guidance needs to be given with links to supporting information as there are many methods which people have not heard of (examples given). Guidance should not discourage more innovative and unusual approaches.	Noted
22	Question whether it is appropriate to set specific targets on the use of energy saving	Noted. However, the draft PPS and Code for Sustainable

Resp no	Comment	Officer response
	measures and reduction of carbon in a planning document. Technology is advancing rapidly and using different energy saving measures will be different for each development proposal. For example, it may not be physically possible to provide on a new building a sedum roof that assists sustainable drainage as well as solar power panels and a wind turbine. The Borough's guidance on energy saving measures should take the lead from government guidance and set objectives that are not prescriptive but instead promote the consideration of different options.	Homes provide clear guidance on what LPAs should be seeking in new developments and, in so doing, sets out the range of technologies that could be used. It is not prescriptive as to which techniques should be used.
23, 24	Water conservation is an important part of sustainable planning and the SPD is a suitable place to promote water conservation	Noted. Guidance has been provided on SUDS and green roofs, in addition to requiring that level 3 of the Code for Sustainable Homes be achieved, which requires that certain levels of water usage be achieved.
25, 26	(i) Conservation of water resources is becoming of most utmost national importance for everyone.	Noted. Guidance has been provided on SUDS and green roofs, in addition to requiring that level 3 of the Code for Sustainable Homes be achieved, which requires that certain levels of water usage be achieved.
27, 28, 29, 32	(i) The southeast already suffers from water-shortages. It is extremely important that detailed guidance is provided on the conservation of water resources and such guidance should certainly include grey water usage etc.	Noted. Guidance has been provided on SUDS and green roofs, in addition to requiring that level 3 of the Code for Sustainable Homes be achieved, which requires that certain levels of water usage be achieved.
31	With the growing pressure on aquifers and rivers to supply water in drought conditions we believe it is vitally important to provide guidance on measures to conserve water resources.	Noted
Issue 9 – Surface water drainage Question 1 – Which option do you support and why?		
2	The document should include the Council's expectations for the provision of SUDS	Noted. The draft SPD provides a basic summary of SUDS and provides links to best practice guidance.
3, 4, 15, 17, 25	(i)	Noted
5	Thames Water recognises the environmental and economic benefits of SUDS. However, these are not appropriate for all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. Should include the following in the SPD: 'It is the responsibility of a developer to make proper provision for surface water drainage to ground, water course or surface water sewer. It must not be allowed to drain to the foul sewer, as this is a major contributor to sewer flooding.'	Noted. Reference is made to the Interim Code of Practice and to the need for early consultation with relevant stakeholders (including water companies) to ensure that the site and approach is sustainable and maintenance is considered.
8	It is difficult to choose a preferred option without knowing the details of option (i). We would not object to option (ii) as we consider the Interim Code of Practice for SUDS provides comprehensive guidance. We are supportive of the objectives of SUDS. However, they require long term maintenance. Failure of the SUDS could lead to inundation of foul sewers with surface water run-off due to the resulting pressure and the interconnected nature of the sewerage system. Design must be appropriate for the	Noted. Reference is made to the Interim Code of Practice and to the need for early consultation with relevant stakeholders (including water companies) to ensure that the site and approach is sustainable and maintenance is considered.

Resp no	Comment	Officer response
	location, including factors like topography, run-off rates and ground conditions. Where SUDS are not appropriate, alternative arrangements must be made for surface water drainage, which should not be drained to foul water sewers as this will increase the risk of foul water flooding.	
13	In relation to both questions, it is considered that the SPD should only refer to the Council's aspirations in relation to SUDS with appropriate links to guidance, as such as the Interim Code of Practice.	Noted. This is the approach that has been taken in the draft SPD.
14	(i) Highways Agency can't cope as it is – any form of improvements via developers would be useful.	Noted
16	(ii) plus indicating that design statements should demonstrate water conservation measures, taking into account local drainage arrangements and soil type.	Noted. However, these requirements would need to be addressed under the requirements of the Code for Sustainable Homes / BREEAM.
20	The SPD should refer to the Interim Code of Practice for SUDS but also briefly state the borough's expectations where they differ from the interim code. When a better code arises, this should be used.	Noted
22	Question whether it is appropriate to set specific targets on the use of energy saving measures and reduction of carbon in a planning document. Technology is advancing rapidly and using different energy saving measures will be different for each development proposal. For example, it may not be physically possible to provide on a new building a sedum roof that assists sustainable drainage as well as solar power panels and a wind turbine. The Borough's guidance on energy saving measures should take the lead from government guidance and set objectives that are not prescriptive but instead promote the consideration of different options.	Noted. However, the draft PPS and Code for Sustainable Homes provide clear guidance on what LPAs should be seeking in new developments and, in so doing, sets out the range of technologies that could be used. It is not prescriptive as to which techniques should be used.
23	Council's expectations for SUDS in new developments need to be set to mitigate effects of climate change.	Noted. The requirement for SUDS will help to reduce the impact of development on climate change. However, it is fundamental that a raft of measures be implemented to mitigate the effects of climate change.
24, 25	SUDS make an important contribution to sustainable development and welcome information relating to the council's expectations relating to the provision of SUDS.	Noted
26	(i) Basic guidance is not adequate. Developers should be in no doubt about what the Council requires.	Noted. However, it would be inappropriate to include too much detail in the document due to concerns that this may date in time. It is therefore proposed to provide a brief summary with links to best practice.
27	(i) This is extremely important, especially with the increased risk of flooding that will occur in the years to come due to climate change.	Noted
28	(i) See reply to issue 8. No mention is made of sewage disposal and where the water that results from this is to go. Should this be under biodiversity?	Noted. This issue is being addressed through the Water Cycle Study being undertaken by the Council with partners including Environment Agency, Natural England and water companies.

Resp no	Comment	Officer response
29	Support option i) and police them.	Noted
31	<p>As many SUDS schemes involve discharges of surface water to ground, and indirectly to groundwater, these systems should also be viewed in the context of groundwater protection. Groundwater is an important resource and is the source of drinking water for Basingstoke residents. Large areas of the Borough lie within source protection zones.</p> <p>Where the construction of balancing ponds are used as Sustainable Urban Drainage System (SUDS) the design should maximise on the biodiversity value that open water can provide and include shallow margins where native marginal plants should be planted. In addition the profile of the bed should vary with shallow areas in places to create a varying depth profile. This will promote greater diversity of flora and fauna. The Interim Code of Practice provides valuable information of SUDS. However, it would be preferable for the Council to produce its own local guidance taking into account wildlife habitats, ground conditions and groundwater protection. Traditional piped systems should be avoided in favour of SUDS which create wildlife habitats and improve water quality. These features generally involve the use of surface flow routes rather than piped systems (e.g. swales, balancing ponds, etc.)</p> <p>Documents to consider: -CIRIA C697 The SUDS manual -C698 construction manual</p>	<p>Noted. The Borough Council recognises the importance of groundwater and the impact of SUDS and considers that the most appropriate option is to provide a basic summary of SUDS and to refer to the Interim Guidance. Furthermore, advice is given that the developer contacts the EA and water bodies at an early stage of the design process.</p> <p>The documents referred to have been added to the SA.</p>
32	Support option i). Ensure this is complied with.	Noted
Issue 9 – Surface water drainage		
Question 2 – Does the Interim Code of Practice provide sufficiently local guidance?		
4	I believe so, if not it should be revised	Noted
14	Yes	Noted
23	No. The Interim Code of Practice needs more detail.	Noted. However, the Borough Council does not have sufficient detailed knowledge to prepare additional advice and to keep it up to date. It is therefore more appropriate to refer to national guidance.
26	The National SUDS Code of Practice is a useful guide but unlikely to provide sufficient guidance on local conditions.	Noted. Early consultation with the EA and water bodies is advised in the draft SPD.
28	Do not feel qualified to comment. No experience of its application.	Noted
29	Probably not	Noted. However, the Borough Council does not have sufficient detailed knowledge to prepare additional advice and to keep it up to date. It is therefore more appropriate to refer to national guidance.
Issue 10 – Targets		
Question 1 – Which option do you support and why?		

Resp no	Comment	Officer response
2	Targets are necessary to drive improvements but they should not be unrealistic and therefore unachievable providing a negative outcome. At the very least follow the national targets making any adjustments for local circumstances.	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards. For new development (other than small-scale) the draft SPD seeks Level 3 of the Code for Sustainable Homes and 'very good' BREEAM. These levels include targets that exceed existing Building Regulations but are considered realistic and achievable.
3, 7	(i)	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
4	(i) A one size fits all approach is not practicable and could result in missed opportunities in some areas and far too costly / stringent rules in other areas.	Noted. The levels set out in the draft SPD are based on the achievement of an overall score under the Code for Sustainable Homes / BREEAM that allows some flexibility subject to meeting certain minimum standards.
10	(ii) Local targets based on national targets, but adapted to reflect the already strong performance of the Borough and to exceed national targets where feasible.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
11	(i) If we are going to spend time / public money then let it be on how to meet the targets, not on excuses not to.	Noted. The draft SPD uses standards in the Code for Sustainable Homes / BREEAM both of which make it clear what is needed to achieve a certain standard.
13	In relation to all three questions, the Council should await the conclusion of the current consultation process in relation to the PPS in order to ensure the approach taken is reflective of national advice.	Noted. However, the draft PPS on Climate Change is a material planning consideration and paragraph 1.14 of the document states that pressure to halt plan-making until it is finalised should normally be resisted.
14	(i) Imperative with threat of global warming, drought etc	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
15	(i) Borough targets should match Government settings	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
16	(ii) In line with the requirements of the SE Plan	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
17	(iii) Unless the target is all embracing and easily measured it can lead to bureaucracy and high costs and often encourage unintentional behaviour. Leave the measurement to those who set the targets.	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards that can be more easily implemented and measured.
18	(iii) As these type of targets whether national or local are borough targets (not developer requirements) and should be covered elsewhere (eg in the core strategy) rather than in	Noted. The approach of the draft SPD is to link improvements in new development to national targets and

Resp no	Comment	Officer response
	SPD. The SPD should only be providing guidance specific to development / developers.	standards and provides guidance specific to development / developers.
20	Do not want any new houses, as by definition they cannot be sustainable, and resources are already overstretched. However well designed, new housing development means the destruction of valuable land and countryside and loss of animals and plants therefore any targets must be the highest achievable.	Noted. However, Government planning policy in PPS1 is that LPAs should plan to meet the expected needs for housing and other development in a way that is in line with the principles for sustainable development in the UK strategy.
23	Reproduce all national targets to demonstrate that the council is forward thinking and is concerned about climate change.	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
24	Support the creation of targets and standards to help achieve objectives and monitor success.	Noted
25	(ii) Local ability to provide must vary, directed by local needs.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
26	(ii) Provided that local targets are no less than the national ones with an aim to be more ambitious where possible.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
27	Taking into account local circumstances and needs could be used as an excuse not to take the sort of action to reduce CO2 levels that is required. The problem of climate change is so severe that I would favour following (or exceeding) national targets.	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
28	(ii). 'Blanket' targets are less likely to be achieved. Targets must be achievable within the local context.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
29	Support option ii) if they are an improvement on national targets, otherwise option i).	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets. The approach of the draft SPD is to link improvements in new development to national targets and standards.
32	Support option ii). Local circumstances have to be considered.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
Issue 10 – Targets		
Question 2 – If local targets are set, how should they be derived?		
4, 32	Via consultation	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
10	Local targets based on national targets, but adapted to reflect the already strong performance of the borough and to exceed national targets where feasible	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local

Resp no	Comment	Officer response
		targets.
14	By monitoring initially and implementation with a 3 year timeframe	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
15	Via the Government	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
16	Test that new buildings conform with best practice at the time and incorporate building regulations in line with issue 11 option (iv)	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
23	No local targets, as there cannot be cannot be local concessions without the implementation of a national simultaneous policy.	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
25	By co-operation	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
26	Using the national targets as a baseline than using local circumstances and advances in technology to improve targets where practicable. Local targets should be regularly updated to reflect advances in technology.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
27	Follow what other local authorities such as Woking have done. They achieved a 77.4% reduction in CO2 emissions.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
29	By insisting on cleaner generation and use of cleaner fuels. Higher targets for towns and large villages than for rural areas with inadequate public transport.	Noted. However, the Borough Council does not have sufficient detailed knowledge/expertise to develop local targets.
Issue 10 – Targets Question 3 – If no targets are set how should progress in implementing the SPD be monitored?		
4, 23, 27	Targets are needed	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
17	Data evaluation of planning applications. Evaluation of data generated by national and regional bodies (eg water companies)	Noted. However, it is considered that this approach would not be sufficient to monitor implementation of the SPD
18	Through performance standards	Noted. The approach of the draft SPD is to link improvements in new development to national targets and standards.
Issue 11 – Performance standards Question 1 – Which option do you prefer and why?		
2	Should follow the example of Merton and apply tough standards	Noted. The draft SPD uses the Code for Sustainable Homes to apply performance standards to new residential

Resp no	Comment	Officer response
		development given it is a national standard prepared by the Government with the construction industry and is likely to be made mandatory in the future. The similar BREEAM method is adopted for non-residential development. The standards proposed in the draft SPD (Level 3 of the Code and BREEAM 'very good' for other than small-scale development) are considered to strike the right balance between improved sustainability performance and standards that are realistic / achievable.
3	(i)	Noted. However, it is considered that without standards in the SPD there would be insufficient guidance for developers and agents.
4	(iv) A significant amount of research has gone into the preparation of the codes and it would be a waste of scarce resources if BDBC tried to reinvent the wheel	Noted. The approach of the draft SPD is to use the Code for Sustainable Homes and BREEAM to measure the sustainability performance of new development.
7, 23, 28, 29, 32	(ii)	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of new development across a range of performance standards) is preferable to separate standards.
8	(ii) and provision of separate performance standards on use of water	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of new development across a range of performance standards) is preferable to separate standards. Both include an assessment of water consumption.
11	(ii) If we are going to spend time / public money then let it be on how to meet the targets, not on excuses not to.	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of new development across a range of performance standards) is preferable to separate standards. Both of which make it clear what is needed to achieve a certain standard.
13	(iv) Most issues will only be applicable at construction stage and building regulations therefore represent the most appropriate means of control, which should not be duplicated in planning policy.	Noted. This is the approach taken in the draft SPD.
14	(ii) Easier to interpret and action	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of

Resp no	Comment	Officer response
		new development across a range of performance standards) is preferable to separate standards.
15	(iv) Must link to national standards	Noted. This is the approach taken in the draft SPD.
16	(iv) Rely on standards that are known and understood by the construction industry; are measurable and supported by national guidelines	Noted. This is the approach taken in the draft SPD.
17	(i) As other options would not be cost-effective – option (iv) is probably a noble alternative	Noted. However, it is considered that option (iv) is preferable.
18	(iv) Will provide a consistent approach and national standards will be better understood by developers. Also address issue 13 as they are regularly updated. Assume (ii) relates to the Milton Keynes approach in the checklist in their SPD which appears to be simple, user friendly and has benefits to applicants of smaller applications. (ii) may have relevance in this context - would welcome more detail on what these options would entail.	Noted. However, it is considered that option (iv) is preferable.
24	Support the creation of targets and standards to help achieve objectives and monitor success.	Noted
25	(iii) Guidelines must be drawn up if only indicative	Noted. However, it is considered that option (iv) is preferable.
26	(ii) To minimise the amount of energy consumed, carbon dioxide emissions and water used, it is necessary to have a target for each utility. However, some flexibility should be allowed because some sites will be able to exceed targets where others can't. Existing systems can be used as a guide.	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of new development across a range of performance standards) is preferable to separate standards. Within the Code there are minimum standards for energy and water consumption.
27	I would favour option (ii). CO2 emission monitoring would be the best option (to encourage use of CHP). A problem with option (iii) is that if a developer was very good at e.g. conserving water they might be somewhat let off the hook of reducing CO2 emissions.	Noted. However, it is considered that the approach of the Code for Sustainable Homes and BREEAM (that provide an overall assessment of the sustainability performance of new development across a range of performance standards) is preferable to separate standards.
Issue 11 – Performance standards		
Question 2 – Do the existing performance measurement systems cover all of the issues that should be covered?		
4, 16, 25	Believe so and if not, they are likely to be updated.	Noted
13	Existing performance measures cover all relevant issues	Noted
14, 29	No	Noted. However, it is considered that the new Code for Sustainable Homes and BREEAM adequately cover the main issues of sustainability performance of new buildings.
23	No, measurement systems should include water and waste recycling	Noted. However, it is considered that the new Code for Sustainable Homes and BREEAM adequately cover the main issues of sustainability performance of new buildings, including water use and waste recycling.

Resp no	Comment	Officer response
32	Care needs to be taken to consider the setting of all these modern measurements. Historic and cultural buildings and settings need to be protected too.	Noted. The draft SPD states that in certain circumstances it may not be possible to meet these standards, though the onus will be on the applicant to demonstrate this.
Issue 12 – Level of emissions and consumption Question 1 – Which of the above levels should be set and why?		
2, 25	Aim for the highest reasonable / possible	Noted. The draft SPD uses the Code for Sustainable Homes / BREEAM to apply performance standards to new development. Both of these assessment systems cover carbon dioxide emissions / energy use and water consumption. With regard to residential development Level 3 of the Code will be sought for other than small-scale development. This requires at least a 25% improvement on carbon dioxide emissions compared to Building Regulations and a minimum standard of water consumption of 105 litres per person per day. These minimum standards of performance are considered to strike the right balance between improved sustainability performance in these key areas and standards that are set at realistic levels.
3	(i)	As above
4	Rather poor performance – ie percentage reduction from what baseline? Prefer the concept of best practicable means	As above
7, 29, 32	(i) 25%, (ii) 20%, (iii) 125 litres	As above
14	(i) – 25% - reduced emissions will have a knock-on effect nationally and globally	As above
20	In view of climate change and its many consequences, we cannot afford to have anything but the most challenging targets ie 25% reduction in emissions minimum. More than 20% of energy provided by on-site renewable sources, maximum water consumption of 125 litres / person / day.	As above
23	All of the above should be set (including water and waste recycling) at the higher base level figure as they won't be achieved in practice but may hit lower targets.	As above
26	Carbon emissions may be the Govt's preferred method of measurement but the Council should be encouraging all forms of renewable generation and efficiency savings. All the above options should be used to minimise the Borough's carbon footprint. If the targets above are realistic, then (i) should be 25%, (ii) 20% and (iii) 125 litres.	As above
27	Option (i) is preferred, though these % reduction figures should be made incrementally more strict in the future (and the base line should be higher). Developments should aim to be made carbon neutral whenever possible. If option (ii) were chosen then (a) the % should be higher (some councils specify 30%) and credit should be given for the use of CHP systems, but I would still favour option (i).	As above
8	Support option (iii). The maximum consumption set out in the SPD should be realistic and	Noted. It is considered that the standard of 105 l/h/d under

Resp no	Comment	Officer response
	enforceable by the planning authority. We estimate that a saving of 8% below current average use could be achieved through metering of new properties and incorporation of water efficient fittings and appliances, equating to 138 l/h/d. Southern Water has no power to enforce water efficiency to levels that could achieve 125 l/h/d. Govt consultation on water efficiency looks to introducing new regulations. Higher levels of efficiency may be achievable depending on the outcome. The Code for Sustainable Homes was published in Dec 06 and sets a mandatory minimum standard of 120 litres per person per day for a sustainability rating of 1. We support this, provided it can be enforced by the planning authority.	Level 3 of the Code is realistic and enforceable.
5	(iii) But not sure how this would be implemented now and in the future, once development is completed to ensure levels are maintained. As stated above, no legislation exists to make developers install energy /water efficient products and prevent retro-fitting.	Noted. The limitations of the planning system with regard to the use and maintenance of appliances that are more energy/water efficient are recognised. The assessment systems referred to in the draft SPD seek to encourage the use of such appliances by ensuring they are fitted in new development.
9	Object to the 10% or more of energy requirements to be provided from on-site renewables. Whilst it is right that these are considered, they should not stifle regeneration. It has yet to be demonstrated that end purchasers pay higher costs, and such initiatives are often a cost to the developer, which are not taken into account in land costs. Specific requirements could make some schemes unviable and as a result housing sites may not come forward. Where difficult sites are being regenerated and costs are significant, other issues may be more important, eg contamination clean ups and affordable housing. The viability of delivering schemes must be a priority. We object to any specific requirement of renewable energy provision unless the viability issue is made clear in the policy.	Noted. The draft SPD uses the Code for Sustainable Homes / BREEAM to apply performance standards to new development. These systems include flexibility as to how standards relating to carbon dioxide emissions / energy use are met. The draft PPS on Climate Change provides support for seeking on-site renewable energy in substantial new development.
11	In relation to both questions, the Council should await the conclusion of the current consultation process in relation to the PPS in order to ensure the approach taken is reflective of national advice.	Noted. However, the draft PPS on Climate Change is a material planning consideration and paragraph 1.14 of the document states that pressure to halt plan-making until it is finalised should normally be resisted. It is considered that the approach taken in the draft SPD is consistent with the clear trend of national advice.
16	Shouldn't this be achieved by building to the best and most energy efficient standards of construction as required by national and not local standards.	Noted. This is the approach taken in the draft SPD.
18	Use existing standards – if levels are set, we would anticipate that a financial assessment would be undertaken to justify what levels can be supported by various types / sizes of development in order to set informed levels.	Noted. This is the approach taken in the draft SPD.
24	Support the creation of targets and standards to help achieve objectives and monitor success.	Noted
Issue 12 – Levels of emission and consumption Question 2 – Are there any alternatives?		

Resp no	Comment	Officer response
4	There are many codes and best practice guides (and more being prepared) which set meaningful targets for buildings in terms of CO2 emissions per m2 or m3 and water per person.	Noted
23	Alternatives can be introduced when understanding and technology improves	Noted
26	To have no standards and let global warming accelerate	Noted
27	A more strict form of (i) – passive or carbon neutral developments as an ideal	Noted. However, it is considered that the levels proposed in the draft SPD strike the right balance at the present time between improved sustainability performance and standards that are set at realistic levels
29	Only those which make it clear to all concerned just how grave the situation is.	Noted
Issue 13 – Static or increasing performance standards		
Question 1 – Which option do you support and why?		
2	Standards should be based on the highest viable energy efficiency or carbon reduction with perhaps a sliding scale over a period of time with a high fixed target.	Noted. However, it is considered that the approach proposed in the draft SPD of expecting new development to achieve certain levels of the Code for Sustainable Homes / BREEAM is appropriate given that Government policy is still emerging and targets for moving to zero carbon housing are the subject of consultation. The opportunity exists to include new policies on renewable energy and sustainable construction in the emerging LDF Core Strategy, taking account of final Government policy.
3, 14, 28, 29	(ii)	As above
17	(ii) Best reflects technological and commercial advances	As above
32	Support option ii). Constant monitoring and improving standards are needed to help contain global warming and pollution.	As above
4	Either (ii) or (iii) as what can be done at reasonable cost will change with time. If (iii) is chosen there should be an element of ‘at reasonable cost’ as per pollution control legislation.	As above
7, 10, 11	(iii)	As above
19	(iii) As improvements in technology tend to be stepped rather than incremental	As above
25	(iii) There will be changing costs and quality of technologies	As above
26	(iii) Use national targets as a baseline then using local circumstances and advances in technology to improve targets where practicable. Local targets should be regularly updated to reflect advances in technology.	As above
27	(iii) If new developments are to become carbon neutral within 10 years then strict standards need to be applied. Better if Basingstoke could achieve this before the government’s deadline.	As above
20	Performance standards need to be increasing. With better technology to do it, standards	As above

Resp no	Comment	Officer response
	should be raised all the time, also as more and more people believe that climate change is happening and is caused by human activity there will be a greater desire for higher standards. Don't know whether option ii or iii is better.	
13	In relation to both questions, the Council should await the conclusion of the current consultation process in relation to the PPS in order to ensure that approach taken reflects national advice.	Noted
15	Linked to Government standards	Noted
16	A national, not local issue, reflected in regional plans and therefore a local plan requirement	Noted
18	Existing standards are regularly updated	Noted
24	Support the creation of targets and standards to help achieve objectives and monitor success.	Noted
Issue 13 – Static or increasing performance standards		
Question 2 – If standards should be raised over time, by how much and how often?		
4	Best practical technology – not involving excessive costs concept	Noted
10	Maximum viable	Noted
13	In relation to both questions, the Council should await the conclusions of the current consultation process in relation to the PPS in order to ensure the approach taken is reflective of national advice	Noted
15	As set by the Government	Noted
23	Reviewed yearly to match national targets	Noted
25	Depends on costs and changing technologies	Noted
26	Standards should be reviewed annually to reflect improvements in technology	Noted
27	Minimum standards should be set so as the Government targets can be realistically met (and ideally exceeded)	Noted
29	By x% (say 3%) p.a. for the foreseeable future.	Noted
32	Cannot predict but aim for maximum possible.	Noted
Issue 14 – Thresholds for implementation		
Question 1 – Which of these options do you support and why?		
2, 7, 8, 16, 17, 23, 32	Should apply to all new build, though with extensions as a possible exception.	Noted. However, it is proposed that the draft SPD will only apply to developments of greater than 10 dwellings / 1,000m2 floorspace, since these sites will offer the greatest scope for
3	(iv)	Noted. This is the approach which is proposed.
4, 14, 18	(ii) it would be unreasonable to load all on to a modest extension to an existing home for example	Noted
5	Support option (iv) - water usage from residential is greater than non-residential and therefore need a method to prioritize applications. Need flexibility in approach especially	Noted. This is the approach which is proposed.

Resp no	Comment	Officer response
	in areas where there is a known deficit and it may be that assessments are required for sites with less than 10 properties especially where the cumulative effect of development needs to be assessed.	
10	(iii) because the same standards could not be applied to an extension as to a new build, for example	Noted. It is recognised that there is a need for different standards between different sized developments and the SPD has been drafted accordingly.
13	Option (ii) represents the most appropriate approach. It is important that each of the issues in the SPD is considered on its merits in relation to individual proposals. For example, at which point housing mix and renewable energy become viable and appropriate will vary considerably and should not be triggered at the same threshold.	Noted. However, it is considered that the application of different elements at different standards may result in inconsistency and difficulties in implementation.
19	(i) set clear expectations to all that these are the outcomes expected in our borough. With thresholds there is the facility to just dip under the threshold and abdicate from responsibilities towards a sustainable design.	Noted. This is the approach which is proposed.
20	All requirements of the SPD should be applied to all development as a general principle. Exceptions to the rule could be argued on a case by case basis, (like case law) and exceptions made used for similar exceptions in the future. It is too difficult in view of the many different circumstances to define when a development should comply 100% and when not. However, this opinion is made with only limited knowledge.	Noted. However, it is considered to be appropriate to apply the requirements across the board for all developments above the threshold set out in the draft SPD.
25	(i) no guidelines – no performance	Noted
26	(iii) the SPD performance standards should be applied to all development but variations allowed to reflect the achievable standards of the site due to its size and location	Noted. This is possible under the Code for Sustainable Homes, which allows over-performance in some non mandatory areas, to compensate for under-performance elsewhere.
27	I can see the reasoning behind having thresholds, but technology is available on a range of scales for e.g. microgeneration and grey water recycling. I would like to see (i) applied, but I don't know enough about the feasibility of this so would accept (iii) if the rules were kept strict.	Noted
28	Support option iii). Some flexibility will be required for the policies to have credibility and be implementable.	Noted. It may be possible to permit exceptions under certain circumstances, such as in listed buildings.
29	Whichever is likely to produce the earliest improvement.	Noted
Issue 14 – Thresholds for implementation		
Question 2 – Are the suggested thresholds appropriate?		
4	Would prefer a residential threshold of 5 dwellings and non residential of 500m2	Noted. However, it is proposed to use a threshold of 10 dwellings or greater / 1,000m2 or greater in accordance with the advice in the supplement to PPS1.
13	On the basis that different thresholds are considered appropriate for differing issues covered by the SPD, a single threshold will not be appropriate. With regard to residential, it is highly unlikely that a scheme of 10 dwellings will be capable of providing a percentage of its power from renewable energy without affecting viability.	Noted. However, experience from other local authorities and the advice in the draft supplement to PPS1 suggest that it is feasible to secure renewable energy from sites of 10 dwellings or greater.

Resp no	Comment	Officer response
14	Yes	Noted
18	Depending on level set (eg Ecohomes good / very good or Code for Sustainable Homes 3 or 4) we would have concerns that the standard may not be achievable for the thresholds proposed in (iv) and would place too much financial burden on smaller developments	Noted. The draft SPD reflects the advice in the draft supplement to PPS1, which is considered to be achievable. The requirements have not been applied to smaller sites due to potential viability problems.
23, 32	No	Noted. However, the draft SPD reflects the advice in the draft supplement to PPS1.
26	There should be no thresholds – all new development should be subjected to performance standards.	Noted. It is not considered to be feasible to apply the requirements to all new development at this stage, given the issue of viability of developing smaller sites.
Issue 14 – Thresholds for implementation		
Question 3 – If not, what should the thresholds be?		
4	5 dwellings and 500m2	Noted. However, it is proposed to use a threshold of 10 dwellings or greater / 1,000m2 or greater in accordance with the advice in the supplement to PPS1.
13	There should be a range of thresholds to reflect each case. In all circumstances the thresholds should be sufficiently flexible to allow for consideration of the individual merits of each proposal and location. With regard to energy efficiency and renewables, the Council correctly refers to 'substantial' new developments. However, this should not apply to 10 dwellings, but to 100 dwellings or more.	Noted. It is considered that there is significant scope for securing renewable energy and energy reduction measures in developments of 10 or more dwellings and the SPD has been drafted accordingly. This reflects the advice in the supplement to PPS1 and will ensure consistency across the Borough.
18	A financial assessment should be undertaken to justify what level can be supported for what size of development, for a variety of sites, with other varying site constraints, in order to set an informed threshold.	Noted. However, experience from other authorities and from Government research indicates that this is the appropriate threshold. It also reflects the advice in the draft supplement to PPS1.
23	Residential – each dwelling	Noted. However, it is difficult to achieve high levels of sustainability on individual dwellings in the majority of cases and it would be unnecessarily onerous to seek this on all new dwellings at present. However, sites of fewer than 10 dwellings will need to be accompanied by a consultation statement to detail how sustainable features have been considered.
29	At least 50% tighter	Noted. However, the Borough Council currently has no requirements.
Issue 15 – Assessment		
Question 1 – Which option do you prefer and why?		
3, 4, 10, 11, 13, 14, 16, 17, 18, 19,	(i) No need to reinvent the wheel – use existing best practice for consistency	Noted. It is proposed to use the existing established mechanism for consistency and transparency.

Resp no	Comment	Officer response
20, 23, 26, 29		
7, 25, 28, 32	(ii)	Noted. However, it is considered to be too resource intensive to develop a bespoke method, which may result in confusion for developers between different local authorities using different standards and methods of assessments.
8	Would not support an assessment method that would compromise implementation of water conservation measures. A system that allows elements to be traded against each other could promote one element at the expense of another. The best option is the Code for Sustainable Homes, which sets mandatory standards in relation to conservation of water on the proviso that it can be enforced by the planning authority.	Noted. Water conservation is a key element of the Code for Sustainable Homes and the BREEAM assessment.
15	As set by the Government	Noted. The Code for Sustainable Homes has been developed by the Government and the standards included in the SPD are broadly in line with those in the supplement to PPS1.
27	Look to Council officers	Noted
Issue 15 – Assessment		
Question 2 – Do the assessment methods of other organisations provide complete coverage of the issues?		
4	As far as I know	Noted.
13	The key issues raised with these 2 questions relate to matters already addressed through the Building Regulations and the SPD should only seek to refer to those assessment methods. Any changes or additions to those methods should not be considered in the context of a planning policy document.	Noted. The Building Regulations deal with the construction of buildings and do not currently require measures such as the use of renewable energy, which is considered to be fundamental, given the impact of climate change.
23, 26	Yes, complete coverage at current understanding and technology	Noted
32	No. These change all the time.	Noted. However, standards such as BREEAM are reviewed periodically and the requirements of the Zero Carbon Homes does require increasing an increase in performance over time.
Issue 15 – Assessment		
Question 3 – Should there be flexibility in complying with different requirements		
4, 14, 17, 28	Yes, use the principles of life cycle assessment – allow trade offs between target areas	Noted. A limited amount of trade-off is permitted via the standards, set out in the Code for Sustainable Homes / BREEAM.
10, 23, 29, 32	No, trade offs would reduce the overall impact of standards and over-performance in one area should not condone under-performance elsewhere	Noted. However the Code for Sustainable Homes / BREEAM do permit a degree of flexibility which is useful given that all sites will have different characteristics.
18	National standards incorporate flexibility	Noted
20	Must be careful that flexibility in assessment does not lead to un-necessary lowering of	Noted

Resp no	Comment	Officer response
	standards	
26	There should be flexibility to ask for higher standards on a site that can achieve them and lower standards if a site cannot achieve the normal standards required.	Noted. This is the approach that is being proposed in the draft SPD.
32	No. All areas should minimise environmental impact provided historical and scenic settings are not compromised.	Noted
Issue 16 – Implementation		
Question 1 – What is the best way of ensuring that measures are implemented?		
3	(ii)	Noted. It is proposed that documentary evidence via accredited assessors will be required as a part of the development control process.
4	Combination of (ii) and (iii)	Noted. It is proposed that documentary evidence via accredited assessors will be required as a part of the development control process.
10	(iii)	Noted. It is proposed that documentary evidence via accredited assessors will be required as a part of the development control process.
13	Council’s enforcement powers are considered sufficient to ensure implementation	Noted. It is proposed that use would be made of appropriate conditions to ensure compliance.
7, 14, 15, 29	(i) monitoring on site during and after works	Noted. It is proposed that documentary evidence via accredited assessors will be required as a part of the development control process.
17	Will depend on the nature and size of the development	Noted. It is proposed that the requirements will apply to the larger proposals only at this stage.
18	(i) support use of conditions to ensure measures are implemented. May need to be supplemented by (ii) and (iv) as necessary	Noted. It is proposed that the requirements will apply to the larger proposals only at this stage, which would include certification and site visits.
24	Support the creation of targets and standards to help achieve objectives and monitor success.	Noted. A specific requirement has been included in the draft SPD.
25	(i) the only sure and friendly way to make certain measures are implemented, which will include site visits.	Noted. It is proposed that documentary evidence via accredited assessors will be required as a part of the development control process.
26, 23, 28, 32	Implementing all 4 options	Noted. It is proposed that use will be made of conditions, certification and site visits.
27	Look to council officers, but the scheme needs to be enforced strictly	Noted. Use will be made of appropriate conditions.
Issue 16 – Implementation		
Question 2 – Should there be provision for developers to make a contribution to a carbon off-setting fund?		
4	Any such approach should be entirely up to the developers and should not be seen as a reason not to comply with the SPD. Many carbon offsetting funds are of little value to environmental protection.	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.

Resp no	Comment	Officer response
7, 11, 28, 29, 32	No	Noted.
10	Yes	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
13	With regard to other matters, addressed through alternative legislation and regulations eg building regulations, it is considered that adequate controls exist to ensure implementation	Noted.
18	Would support the creation of a scheme to allow provision for off-setting contributions as this would provide more flexibility for developers.	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
19	Carbon off-setting schemes divert attention from the fundamental issues that actions have impacts. The best intervention is to design and build and demonstrate sustainability locally in every new build.	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
20	Concerned that a carbon off-setting fund might be like planting trees off set for a journey by plane, or travel journalists paying subscriptions to green projects. This off setting does not prevent the (unnecessary?/undesirable) carbon emissions in the first place therefore I would not be in favour of developers making a contribution to a carbon off-setting fund.	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
23	Yes, carbon offsetting can only be carried out if the beneficiary has been successfully addressed as demonstrating 'additionality'	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
26, 27	Only if the developer can reasonably claim that they cannot meet all or some of the targets because it is technically impossible / as a last resort.	Noted. It is proposed that this approach is not pursued given the potential short-comings of such funds and difficulties in establishing such a mechanism.
Issue 17 – Format of SPD		
Question 1 – What format should the SPD guidance take?		
3, 10, 11, 15, 16, 27	(iii) with printed copies made available to those who require them	Noted. It is proposed that the document will essentially be a web-based tool, with hard copies available from those who require them.
7, 14, 25	(i)	Noted. Hard copies will be made available. However, it is intended to be largely a web-based tool.
4, 17, 26, 28, 29, 32	(iv)	Noted. This is the approach that is being taken with the draft SPD.
23	All formats	Noted. Hard copies will be made available. However, it is intended to be largely a web-based tool.
Issue 17 – Format of SPD		
Question 2 – Do you know of any other documents with a user-friendly format which could be replicated?		
4, 10, 17	No	Noted
23	Consult with other local authorities, local Woking Borough	Noted. Consultation will be undertaken with neighbouring authorities, in addition to organisations such as the Building

Resp no	Comment	Officer response
		Research Establishment.
Issue 17 – Format of SPD		
Question 3 – Should any design guidance be appended to the proposed SPD or available separately?		
4	No strong views	Noted
10, 26, 28, 32	Available separately but linked and referenced in the SPD	Noted. This is the approach that is being proposed in the draft SPD.
14	Separately	Noted. It is intended that the documents will be appended to the SPD, but also made available separately.
16	Supporting documents should be published as sub-documents of an overall SPD so that they are read in this context with appropriate cross referencing	Noted. This is the approach that is being proposed in the draft SPD.

Resp no	Comment	Officer response
General comments – not linked to particular aspects of the Issues and Options		
Thames Water	A key sustainability objective should be for new development to be co-ordinated with infrastructure it demands and to take account of existing infrastructure. Account should be taken of PPS12, para 4.9 and to make reference to infrastructure as identified in B3 – B8 of PPS12. No legislation to enforce developers to implement E1, and point (vii) should make reference to pollution of the environment in its widest context, including air, water and land.	Noted. However, in addition to the Design and Sustainability SPD, proposals would be considered against other relevant policies of the Local Plan (including those on the availability and provision of infrastructure). It is not possible to amend Policy E1 via the SPD.
Network Rail	No comments to make on the SPD.	Noted
HCC Policy Team:	<p>An SPD on this subject would be worthwhile. But in the longer-term a co-ordinated Hampshire-wide SPD would be worth developing, reflecting and building upon the Hampshire-wide Local Area Agreement (LAA) –</p> <p>The Issues and Options document appears to be lacking with regard to the role of sustainable design and construction in (1) minimising the use for primary raw materials (by promoting the use of secondary or recycled materials), (2) design to enable future recycling/composting to take place, (3) promotion of waste minimisation and construction waste recycling at construction sites, (4) re-use of demolition waste on-site etc. The document also fails to mention Policy S1 of the Hampshire minerals and waste 'core' planning Strategy, which is entitled Sustainable Design, Construction and Demolition, and would form part of the Development Plan for Basingstoke and is due to be adopted in June this year.</p>	<p>Noted.</p> <p>Noted. The draft SPD refers to Policy S1 of the Hampshire Minerals and Waste Development Framework and includes sections on re-use and sourcing of materials, re-use of buildings and recycling of waste.</p>
HCC Property, Business and Regulatory Services	Would support SPD guidance that differentiates between what would apply to, or be a requirement of, an outline versus a detailed planning application. Clarity is always beneficial in relation to what information will be required to be provided at what stage, and we would anticipate that what is required to be provided is reasonable at that level of detail. For instance, if the SPD sets an Ecohomes / Code for Sustainable Homes level to be achieved, it would not be expected to demonstrate that this can be achieved as part of an outline planning application, although it would be reasonable to condition this.	Noted. The approach of the draft SPD is to set levels of the Code for Sustainable Homes / BREEAM for significant new development. The process for complying with the requirements is made clear in section 6.
Grosvenor Ltd	Grosvenor recognises the importance of ensuring that all development in the Borough is well designed and sustainable and welcomes the publication of this document. As the draft SPD is some way off, it is difficult to comment on specific policies. In summary, it would be helpful if the draft SPD sets out thresholds at which guidance will be applied and confirm what status the SPD will have. Grosvenor would not wish the guidance to overcomplicate the submission of minor planning applications.	Noted. The draft SPD identifies thresholds for the requirements regarding sustainable construction and resource efficiency. It also states that once adopted the SPD form part of the Borough's LDF and will be a material consideration in the determination of planning applications.

Resp no	Comment	Officer response
Environ. Agency	<p>The existing policy does not seem consistent within itself. The topics referred to in the first paragraph do not relate to points v, vi or vii.</p> <p>There is little on water quality in the document. We understand that a water cycle study is being undertaken for the Basingstoke area, and are surprised that water quality does not feature in this document. Consideration should be given to discharges to ground where there is no mains drainage available and to the capacity of sewerage treatment units in the borough.</p> <p>Pollution prevention and remediation need to be explored in the document. This could include noise, water quality, land affected by contamination, light pollution, etc.</p> <p>Although SUDS is covered in the document, other forms of flood risk have not been considered. We seek clarification as to where flood risk information will be expanded.</p>	<p>Noted. However, it is considered that parts v, vi and vii are relevant aspects of ensuring new development is of a high standard of design.</p> <p>The draft SPD contains a section on SUDS that refers to water quality, pollution and groundwater conditions and flooding. Reference is also made to the Strategic Flood Risk Assessment that is being produced as part of the evidence base for the Core Strategy.</p>
Comments on Sustainability Appraisal		
Natural England	<p>Welcomes the production of the SA Scoping Report and note the contents with interest. The SA is an important element of the approach to planning under the 2004 Act and will help better integration of sustainability issues during the preparation of other documents.</p>	Noted
Environ. Agency	<p>Table 4 Additional documents requested in this table:</p> <ul style="list-style-type: none"> • The Water Framework Directive. • PPS25 Development and flood risk. • CIRIA C697 the SUDS manual and the related CIRIA C698 construction manual. • The Environment Agency's GP3: Groundwater Protection: Policy and Practice which replaces the 1998 Policy and Practice for the Protection of Groundwater. Parts 1-3 of this document are to be released via our website on 17 October, and Part 4 will be out for external consultation for 3 months from November 2006. Part 4 includes the Policies, while Parts 1-3 give more background information on legislation and groundwater in general. • The Basingstoke and Deane Contaminated Land Strategy. <p>Section 5 – Baseline Indicators This section should be updated to include water quality, land contamination and flood risk baseline data.</p> <p>Section 6 – Sustainability Issues PPS23, PPS25 and water quality do not feature in the Sustainability Issues table.</p> <p>Section 7 – SA Objectives Water Quality and Flood Risk do not feature in the sustainability objectives. Although we</p>	<p>Noted. The documents referred to have been added to the Context Review.</p> <p>Baseline indicators on water quality, land contamination and flood risk have been added to the SA.</p> <p>Water quality and flood risk have been included in the SA objectives.</p>

Resp no	Comment	Officer response
	<p>welcome the inclusion of sustainable drainage in the objectives, the other aspects of reducing flood risk are not included.</p> <p>Objective 3 This should read "Number of dwellings built on brownfield / greenfield sites in line with PPS23"</p> <p>The objective "To maintain and improve surface and ground water quality" should be included. This is needed to comply with the Water Framework Directive which considers the water environment as a whole.</p> <p>Appendix 2 Some of the Key Objectives listed in this table are not carried across in the rest of the SA document. These issues are on PPS9, PPS23, PPS25 and there is a lack of sources on water quality.</p>	<p>BVPI 106 on the percentage of new homes built on previously developed land is now used as the indicator.</p> <p>An objective that refers to the capacity of the water environment to meet water resource and waste water treatment requirements.</p> <p>Water quality and flood risk has been incorporated into the SA.</p>