

**Royal Borough of
Windsor and Maidenhead**

**Sustainable Design and Construction
Supplementary Planning Document**

Consultation Report

June 2009

Planning and Development Unit
Royal Borough of Windsor and Maidenhead
Town Hall
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CONTENTS

1.0	INTRODUCTION
2.0	STATEMENT OF CONSULTATION
3.0	STATEMENT OF CONFORMITY WITH THE STATEMENT OF COMMUNITY INVOLVEMENT

APPENDIX A: LIST OF CONSULTEES FOR SA SCOPING REOPRT

APPENDIX B LIST OF CONSULTEES FOR DRAFT SPD AND DRAFT SA REPORT

APPENDIX C DRAFT SPD: SUMMARY OF COMMENTS AND OUTCOME

APPENDIX D DRAFT SA REPORT: SUMMARY OF COMMENTS AND OUTCOME

1.0 INTRODUCTION

- 1.1 This consultation report relates to the council's preparation and consultation for the Sustainable Design and Construction Supplementary Planning Document (SPD) and associated Sustainability Appraisal. It should be read in conjunction with the consultation draft document.

2.0 STATEMENT OF CONSULTATION

Sustainability Appraisal Scoping Report

- 2.1 Previously, a Sustainability Appraisal Scoping Report had been prepared with consultation with appropriate stakeholders over a 5-week period from 23rd May to 27th June 2008. The report was sent to statutory consultees and local groups, including those with a particular interest in sustainability and sustainable design. A list of groups is set out in Appendix A.
- 2.2 In addition to the above steps, the report was also:
- ❖ Available to view in the council's receptions and libraries;
 - ❖ Available upon request from the Planning and Development Unit; and
 - ❖ Available to download from the council's website.
- 2.3 Comments were received from 15 respondents, including 2 statutory bodies. General issues raised in relation to the appraisal framework were:
- ❖ More information was needed on biodiversity;
 - ❖ More relevant information was needed on Building Regulations;
 - ❖ More information was needed on transport issues;
 - ❖ A requirement for a new indicators to SA Objective 14 relating to compliance with Flood Risk Assessment; and
 - ❖ A requirement for a new indicator to SA Objective 17 relating to the amount of UK Biodiversity Action Plan (BAP) habitat in the Royal Borough and further information regarding statutorily designated sites.
- 2.4 All comments were duly considered with amendments reflected within the Revised SA Scoping Report, which was published in September 2008.

Draft SPD and SA

- 2.5 The Sustainable Design and Construction Draft SPD and accompanying Sustainability Appraisal were published for a 6-week period of consultation from 7th November to 19th December 2008.
- 2.6 Notifications of the publication of the consultation documents were sent to in excess of 400 statutory and local groups. A full list of those groups specifically invited to comment is set out in Appendix B.
- 2.7 In addition to direct notification, copies of the consultation documents were
- ❖ Available to view in the council's receptions and libraries;
 - ❖ Available to download from the council's website.
- 2.8 Public notices were placed in local newspapers to correspond to the start of the consultation and a press release issued.
- 2.9 Comments on the Draft SPD were received from 21 respondents. A summary of comments and the outcome is provided in Appendix C to this report.
- 2.10 Comments on the Draft SA Report were received from 4 respondents. A summary of comments and the outcome is provided in Appendix D to this report.

3.0 STATEMENT OF CONFORMITY WITH THE STATEMENT OF COMMUNITY INVOLVEMENT

3.1 The preparation of the SPD conforms to the council's Statement of Community Involvement (SCI), adopted in June 2006. The SCI can be downloaded from the council's website. The table below summaries the SCI requirements for the preparation of SPD and the actions undertaken.

Activity	Statutory Requirement	Action Taken	Non-Statutory Requirement	Action Taken
Evidence gathering	None	Consultation relating to the SA Scoping was undertaken with a revised SA Scoping subsequently issued.	None	None
Draft SPD	Make documents available in principal council offices	Yes	Make documents available in libraries	Yes
	Display documents available on the internet	Yes	Issue a press release	Yes
	Send documents to specific and general consultation bodies	Yes	Place site notices	Not applicable to a topic based SPD
	Place a press notice	Yes	Send neighbour notification letters	Not applicable to a topic based SPD
			Public display / leaflet	Not applicable to a topic based SPD
Adoption	Publicise adoption	Yes	Issue a press release	An article on the SPD has been published in the Planning News section of the website.
	Send letters confirming adoption to bodies that have asked to be notified	Yes		

APPENDIX A: LIST OF CONSULTEES FOR SA SCOPING REPORT

Berks, Bucks and Oxon Wildlife Trust
Bracknell Forest Borough Council
Buckinghamshire County Council
Campaign for the Protection of Rural England
Cookham Society
Crown Estates Office
East Berkshire Ramblers Association
English Heritage
Environment Agency
Government Office for the South East (GOSE)
Jacobs
Maidenhead Civic Society
Maidenhead and District Chamber of Commerce
Maidenhead and District Friends of the Earth
Maidenhead and District Housing Association
Maidenhead Waterways Restoration Group
Marlow Society
Natural England
National Trust
Parish Councils (within and adjoining the Royal Borough)
Reading Borough Council
River Thames Society

Royal Society for the Protection of Birds
Runnymede Borough Council
Society for the Protection of Ascot and Environs (SPAЕ)
Slough Borough Council
South Bucks District Council
South East England Development Agency (SEEDA)
South East England Regional Assembly (SEERA)
South East Water
Sovereign Housing Association Ltd
Spelthorne Borough Council
Surrey County Council
Surrey Heath Borough Council
Thames Awash
Thames Water
Three Valleys Water
Thames Valley Energy
West Berkshire District Council
Windsor and District Chamber of Commerce
Windsor and Eton Society
Wokingham Borough Council
Wycombe District Council

APPENDIX B LIST OF CONSULTEES FOR DRAFT SPD AND DRAFT SA REPORT

A2 Housing Group	C H Lovejoy Farms Ltd
Access Forum	Cable & Wireless
Aeos Project (The)	Caldecotte Consultants
Age Concern	Campaign for Real Ale (CAMRA)
Aircraft Owners and Pilots	Campaign to Protect Rural England (CPRE)
Airport Operators Association	Cannon Court Farm Ltd
Alliance Environment and Planning Ltd	Carbon Trust (The)
Alsop Verrill	Carter Planning Ltd
Amberleigh Homes Ltd	Cass Associates
Ambulance Headquarters	Castlemore Securities Ltd.
Ancaster Lodge Residents Association	Central Networks
Arriva	Centre for Sustainable Energy
Arts Council England, South East	Centrica Plc.
Arup Economics & Planning	CgMs Ltd.
Ascot Community Action Group	Charles Church Developments plc
Ashill Developments	Chartered Institute of Marketing (The)
Atis Real Wetherals	Chester-Fanshaw Ltd.
Atisreal	Chiltern Hundreds Housing Association
Atkinson and Keene	Chobham Parish Council
BAA plc. - Technical Services	Civil Aviation Authority
Banner Homes Group	Clarendon Properties
Barton Willmore Planning Partnership	Cleanaway Ltd.
Barwood Land & Estates Ltd.	Clewer Group Residents Association
Beacon Housing Association	Clewer Manor Area Profile
Beaufort Gardens Residents' Association	Cluttons LLP
Bellway Homes (South East)	Coal Authority (The)
Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Colliers CRE
Berkshire Archaeology	Colnbrook & Poyle Parish Council
Berkshire Association of Local Councils	Commission for Architecture and the Built Environment (CABE)
Berkshire Association of Young People	Commission for Racial Equality CRE
Berkshire College of Agriculture	Community Council For Berkshire
Berkshire Learning and Skills Council	Computer Associates
Berkshire Shared Services	Cookham Parish Council
Bewley Homes Plc	Cookham Society
BG Group	Copas Farm
Biffa Waste Services Ltd	Copas Partnership (The)
Binfield Parish Council	Country Land and Business Association
Bisham Parish Council	Courtney Coaches
Bloomfields Ltd	Cox Green Parish Council
Blue Sky Planning Ltd	Croft & Co
Bluestone Planning Limited	Crown Estate Office (The)
Blythwood Residents' Association	CSK Architects
Borough Church of St Andrew & St Mary Magdalene (The)	Culture South East
Boyer Planning	Cunnane Town Planning
Boyn Hill Baptist Church	Cushman and Wakefield LLP
Bracknell Forest Borough Council	Cycling Touring Club (CTC)
Bray Parish Council	D J Squires and Co Ltd
Bray Society (The)	Datchet Parish Council
Braywick Nature Centre	Datchet Village Society
Brian Smith Consultancy Ltd	David Ames Associates
British Chemical Distributors & Traders Association	David Wilson Homes
British Geological Survey	Dawnay Close Residents' Association
British Horse Society	Defence Estates
British Light Aviation Centre	Department for Culture Media & Sport
British Trust for Conservation Volunteers (BTCV)	Department for Education and Skills
Britwell Parish Council	Department for Environment, Food and Rural Affairs
Broadway Malyan Planning	Department for Transport
Bryant Homes	Department of Constitutional Affairs
Bucks County Council	Department of Trade and Industry
Building Research Establishment	Department of Work & Pensions

Desborough Bowling Club
 Development Land & Planning Consultants Ltd
 Development Planning Partnership (The)
 Dialogue Communicating Planning
 Diocese of Oxford (Finance)
 Directorate of Health & Social Care
 Disability Rights Commission
 Disabled Persons Transport Advisory Committee
 Dis-Course
 Dorney Parish Council
 Dower Park Residents' Association
 Drivers Jonas
 DTZ Piedad Consulting
 East African Association
 East Berks Community NHS Hospital Trust
 East Berkshire College - Langley Campus
 East Berkshire Ramblers Association
 East Windsor Residents' Association
 Edgington Spink and Hyne
 Energy Saving Trust (The)
 English Heritage
 English Partnerships
 Environment Agency
 Equal Opportunities Commission
 ESA Planning
 Eton Town Council
 Eton Traders Association
 Fairview New Homes plc
 Farmglade
 Farming and Wildlife Advisory Group (FWAG)
 Federation of Small Businesses Thames Valley
 Fighting for Datchet
 First Bee Line
 First Great Western Link Ltd.
 First Group Plc.
 Forestry Commission
 Freight Transport Association
 Friends, Families and Travellers Advice and Information Unit
 Friends of the Earth
 Fusion Online Limited
 G L Hearn Planning
 G R Planning Consultancy Ltd
 Garden History Society (The)
 Geo-Plan Consultants Ltd
 George Wimpey West London Ltd.
 Gerald Eve
 Government Office For The South East (GOSE)
 Great Marlow Parish Council
 Gregory Gray Associates
 Guards Club Road Residents
 GVA Grimley
 Gypsy and Traveller Law Reform Coalition (The)
 Gypsy and Traveller Working Group
 Gypsy Council (The)
 Gypsy Council for Health, Education & Welfare
 Hallam Land Management Limited
 Hanover Housing Association
 Haulfryn Group Ltd.
 Health & Safety Executive
 Hedsor Parish Meeting
 Help the Aged
 High Street Methodist Church
 Highways Agency
 Hives Planning

Holyport Preservation Society
 Home Builders Federation (The)
 Home Office
 Horton Parish Council
 Housing Corporation (The)
 Housing Solutions Group (The)/Maidenhead and District Housing Association
 Huntsman's Meadow Residents' Association
 Hurley Parish Council
 Hurley Preservation Society
 Hurst Parish Council
 Hutchison 3G UK Limited
 Hutley Investments
 Indigo Planning Ltd.
 Inland Waterways Association (The)
 J Rayner and Sons Ltd
 Jacobs
 Jacobs Engineering UK Ltd
 Januarys Consultant Surveyors
 James Smith Associates
 Januarys Consultant Surveyors
 Joint Strategic Planning Unit (JSPU)
 Jones Lang LaSelle
 Kennel Green Action Group (The)
 Kennet Properties/Thames Water Property Services Ltd.
 Kilmartin Investments
 King Edward VII Hospital
 King Sturge & Co
 Kings Oak Thames Valley
 Kings Ride Residents' Association
 Knight Frank
 Laing Homes
 Lambert Smith Hampton
 Learning & Skills Council
 Lennon Planning Ltd
 Levvel Consulting Ltd.
 Lichfield Planning
 LIDL UK GMBH
 Linden Homes
 Little Marlow Parish Council
 Littlewick Green Society
 London Borough of Hillingdon
 London Green Belt Council
 Lookahead Housing Association
 Lovell Johns
 Maidenhead & District Chamber of Commerce
 Maidenhead Advertiser
 Maidenhead and District Friends of the Earth
 Maidenhead and District Housing Association
 Maidenhead Archaeological & Historical Society
 Maidenhead Centre for the Handicapped
 Maidenhead Civic Society
 Maidenhead Cyclists Action Group
 Maidenhead Heritage Centre
 Maidenhead Meeting of the Religious Society of Friends
 Maidenhead Riverside Organisation
 Maidenhead Town Partnership
 Maidenhead United Football Club
 Maidenhead United Reformed Church
 Maidenhead Volunteer Bureau
 Maidenhead Waterways Restoration Group
 Malcolm Judd & Partners
 Marist Schools (The)

Marlow Society (The)	Rowan Asset Management
Marlow Town Council	Royal Berkshire Ambulance NHS Trust
Martin Grant Homes Ltd	Royal Berkshire Fire & Rescue Services
Rt Hon Theresa May MP	Royal Mail Group
MENCAP	Royal Society for Protection for Birds (RSPB)
MG Leisure	RPS
Michael Shanly Group (The)	Rugby Estates
Millgate Homes	Runnymede Borough Council
Ministry of Defence	Rural Housing Enabler for Berkshire
Mono Consultants Limited	Ruscombe Parish Council
Montagu Evans	Savills
Nathaniel Lichfield & Partners	Scott Brownrigg
National Association of Gypsy & Traveller Officers	Scott Wilson
National Association of Health Workers with Travellers	Scott Wilson Railways Ltd
National Association of Teachers of Travellers	Scottish and Southern Electric PLC
National Cyclists' Organisation (The)	SE Regional Public Health Group
National Disability Council	Seven Trent Water Limited
National Energy Foundation	Shopmobility
National Farmers Union.	Shottesbrooke Parish Meeting
National Federation of Bus Users	Showmen's Guild of Great Britain
National Grid	Simmons and Sons
National Playing Fields Association	Slough Borough Council
National Probation Services for Thames Valley	Society for the Protection of Ascot and Environs
National Trails Office	South Bucks District Council
National Trust (The)	South Central Ambulance Service (Berks Division)
Nationwide Planning	South East England Regional Assembly (SEERA)
Natural England	South East England Regional Development Agency SEEDA
Network Rail	South East Museum Library and Archive Council
NHS South Central Strategic Health Authority	South East Water
Nicholas King Homes	South West Trains
Norden Farm Centre for the Arts	Southern Gas Networks
O2 UK	Southern Tourist Board
Octagon Developments Ltd	Spelthorne Borough Council
Office of Government Commerce	Sport England
Old Windsor Parish Council	St. Leonard Hill Residents' Association
Paradigm Housing Association	St. John's Ambulance
Parkside Housing Group	Stephen Bowley Planning Consultancy
Paul Dickinson and Associates	Stewart Ross Associates
Peacode & Smith	Subway
People to Places	Sunley Estates
Planning Bureau Ltd (The)	Sunningdale Parish Council
Planning Development Partnership	Sunninghill & Ascot Parish Council
Planning Inspectorate (The)	Surrey County Council
Planning Perspectives	Surrey Heath Borough Council
Portsmouth Diocesan Curia	Sustrans
Powergen	T Mobile
Prince Gate Estates Plc	Taplow Parish Council
Pro Vision Planning & Design	Tesco Stores Ltd.
Queensgate Homes	Tetlow King Planning
Radian Group	TFM Readers
Ramblers Association, East Berks Group	Thames a Wash
Rapleys	Thames Properties Ltd.
RBWM - Access Group	Thames Reach Residents' Association
RD Planning & Land Consultants	Thames Valley Chamber of Commerce
Reading Borough Council	Thames Valley Energy (TV Energy)
Reading Learning and Skills Council	Thames Valley Housing Association
Reading Museum Archives and Library Service	Thames Valley Police
Rectory Homes Ltd	Thames Velo
Red Kite Development Consultancy	Thames Water
Redrow Homes (Southern) Ltd	Thames Water Utilities
Religious Society	Theatre Trust
Remeham Parish Council	Threadneedle Property Investments
River Thames Society (The)	Three Valleys Water
Road Haulage Association	Tourism South East

Toynbee Housing Association Ltd
TPA Design Company (The)
Transition Town Maidenhead
Tribal MJP
Trimount Properties Ltd
Trinity Residential Ltd
Turley Associates
UK Land Investments Group
United Reformed Church
Vincent and Gorbing
Vital Energy
Vivendi Water Partnership
Vodafone Limited
Waltham St Lawrence Parish Council
Warden Housing Association
Wardour Lodge Estates Ltd
Warfield Parish Council
Wargrave Parish Council
West Berkshire Council
West London Aero Club
West Waddy ADP
West Windsor Residents' Association
Wexham Court Parish Council
White Bus Service
White Waltham Parish Council
White Waltham Village Association
White Young Green Planning

Wimpey Homes Holdings Ltd
Windsor & District Chamber of Commerce
Windsor & Maidenhead Conservation Volunteers
Windsor & Maidenhead Users Network
Windsor & Maidenhead Voluntary Action Group
Windsor Allotments and Home Gardens
Association
Windsor and Ascot Driving Group for the Disabled
Windsor and District Housing Association
Windsor and Eton Society
Windsor and Maidenhead Access Forum
Windsor Chamber of Commerce
Windsor Festival Society Ltd
Windsor Talking Newspaper for the Blind
Windsor, Ascot and Maidenhead Executive Office
Winkfield Parish Council
Wokingham Borough Council
Women's National Commission
Wooburn Parish Council
Woodland Trust (The)
Woolf Bond Planning
Wooley Green Landowners' Association
Workers Educational Association
Workspace Group Plc.
Wraysbury Parish Council
Wycombe District Council

APPENDIX C DRAFT SPD: SUMMARY OF COMMENTS AND OUTCOME

Please note that all document references relate to the Sustainable Design and Construction Draft SPD November 2008 and may not be correct following the outcome of the consultation.

Carbon Trust

Document	Other	The Caron Trust is unable to become involved in the SPD process.	Comment noted.
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Carter Planning Ltd (Mark Carter)

Document	Object	There is no attempt to prioritise issues or strike a balance between them. The SPD fails to accept some greenfield land is required for development which will have a negative impact on matters of landscape and biodiversity. The principle of mixed use does not appear to be supported.	Disagree. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of development requirements, and any potential implication for greenfield land, falls outside the scope of this SPD.
Document	Object	Support in principle the aim to increase awareness of environmental impact, however, the SPD lacks vision with a failure to show what contribution the Council will make and instead relies on others to achieve the aims.	Agree. While the council's actions as a landowner and provider of services falls outside the scope of this SPD, it is agreed that reference to the council's corporate position would set the SPD in context and may encourage other organisations to take similar steps in addressing sustainability issues. Changes have been made within Section 1: Introduction to outline council commitments and achievements.
Chapter: 1 Introduction	Object	Paragraph 1.1 is premature in the absence of the LDF Core Strategy.	Disagree. This SPD demonstrates clear links to saved policies from the Local Plan, approved and emerging regional policy, national policy and best practice. The SPD will be reviewed periodically to ensure it reflects changes in policy and best practice.
Chapter: 1 Introduction	Object	Paragraphs 1.1 and 1.3 go beyond the remit of the planning system and deal with matters addressed through other legislation including Building Regulations.	Disagree. Planning and Climate Change, the supplement to PPS1, sets out the government's expectations of planning authorities on reducing emissions and stabilising climate change and taking into account the unavoidable consequences. Planning authorities should amongst other matters design to limit carbon dioxide emissions and use opportunities for decentralised and renewable or low carbon

			energy. While it is a stated principle that controls under the planning, building regulation and other regulatory systems should complement and not duplicate each other, this PPS and others make it clear that standards in advance of building control can be justified through the planning system.
Section: Sustainable Design and Construction	Object	The impact of measures on the viability of schemes must be borne in mind when assessing proposals. The section fails to provide any indication of cost-benefit analysis and how this will be assessed.	It is a general principle of the planning system that exceptions to planning policy and supporting guidance may be made when justified by specific circumstances. Notwithstanding this, a statement has been added within Section 1: Introduction to clarify what is expected of developers in the event of feasibility or viability issues. The diversity and complexity of different development types make standard cross-benefit analysis impractical. The SPD does seek to refer general matters of cost and pay back periods where appropriate.
Section: The Purpose of this SPD	Object	Paragraph 1.11 goes beyond the remit of the Planning System and deals with other areas of legislation, including Building Regulations.	Disagree. Planning and Climate Change, the supplement to PPS1, sets out the government's expectations of planning authorities on reducing emissions and stabilising climate change and taking into account the unavoidable consequences. Planning authorities should amongst other matters design to limit carbon dioxide emissions and use opportunities for decentralised and renewable or low carbon energy. While it is a stated principle that controls under the planning, building regulation and other regulatory systems should complement and not duplicate each other, this PPS and others make it clear that standards in advance of building control can be justified through the planning system.
Chapter: 2 Measuring and Demonstrating Sustainability	Object	<p>The summary table under paragraph 2.2 is confusing. The SPD does not clearly differentiate between smaller, medium and large developments or state the type of development to which the items may be applicable or clearly differentiate between the items required in the Sustainability Statement (whether or not it is in the Design and Access Statement) and in order documents such as the FRA. Suggest the table should be split into two?</p> <p>The phrase "all applications involving changes to floorspace" is not clear. Does it apply to changes of use? Does it apply where there is a net reduction in floorspace? Why do not floodlights which do not require floorspace need this information on light pollution? Do these provisions apply</p>	Agree. The summary table has been reconfigured to provide three tables relating to major, minor and householder / other developments. Related clarifications have been made to the requirements boxes to further improve clarity.

		<p>to a replacement house etc. or is floorspace only relate to commercial applications?</p> <p>The definition under "Scale" should be more clearly re-written.</p>	
Chapter: 2 Measuring and Demonstrating Sustainability	Object	Paragraph 2.2 - The section on "Pollution" does not contribute anything and should be deleted.	Disagree. Impacts arising from existing or new activities can greatly influence environmental quality. It is therefore correct that this SPD advises on potential sources of pollution. This is confirmed by government policy contained in PPS23.
Chapter: 2 Measuring and Demonstrating Sustainability	Object	Paragraph places an unacceptable additional burden on developers, requiring the submission of a mini environmental statement, and should be deleted. These matters can be an integral part of the Design and Access Statement or Building Regulations which are provided by professionals and should not require checking.	Disagree. Paragraph 2.5 recognises that non-major applications will be expected to demonstrate compliance with the SPD through Design and Assess Statements, but also recognises that dedicated statements may be necessary in specific circumstances. All robustness of all evidence should be tested as part of the planning application process.
Chapter: 2 Measuring and Demonstrating Sustainability	Object	It is not essential that matters relating to BREEAM and the Code set out in paragraph 2.4 be dealt with at the application stage. It should be made clear that these matters can be addressed through planning conditions.	Paragraph 2.4 does not require all information to be provided at the submission of planning application but refers to the Pre-Assessment Estimator. Compliance with subsequent stages would be controlled via appropriate planning conditions. Notwithstanding the above, the section has been redrafted to improve clarity.
Chapter: 3 Sustainable Design	Observation	While Section 3 provides a very useful checklist and discussion of approaches, it would benefit from an indication of the acceptability of measures.	Disagree. Supporting comments towards the section in general is noted. The acceptability and feasibility of different sustainability measures will vary depending on site context and the type and scale of development being proposed. It is considered that the approach taken in the SPD of presenting key information provides an appropriate balance between the need to provide an accessible document and a useable level of certainty for the development industry. The council offers a pre-application advice service for those wishing to gain formal advice on the acceptability of potential developments.
Section: Passive Solar Gain	Object	There is little positive steer regarding site layout and no acknowledgement between areas of potential conflict. Figure 1 is misleading with no reference to home zones, open space, mixed unit size and affordable housing. Secure by Design is worthy of a separate section.	Disagree. The section sets out how passive solar gain can be impacted by issues of siting and orientation, the use of landscaping, internal layout and the use of thermal mass. Figure 1 illustrates how the siting and orientation of buildings and roads can impact the potential for solar gain.

			Matters such as those listed are unconnected to passive solar gain and are not related to Figure 1 or this SPD. No changes are required.
Requirement 2	Object	In referring to "all development" Requirement 2 conflicts with the thresholds in the summary table at paragraph 2.2.	Comments noted. Requirement 2 expects developments to reach the highest practical standard of sustainable design to reduce energy demand. It is appropriate that all developments consider their environmental impacts in line with the principles of reasonableness and proportionality. The summary table has been reconfigured to provide three tables relating to major, minor and householder / other developments. Related clarifications have been made to the requirements boxes to further improve clarity.
Section: Flood Risk Management	Object	Paragraphs 3.66 and 3.67 are a duplication of other work elsewhere and should be deleted. Paragraphs 3.68 onwards are suitable. The reference to 27% of the homes being at risk is unlikely to be correct but if it is it should be referenced.	Disagree. These paragraphs provide background and context on the issue of flooding. The percentage of homes considered to be at risk of flooding is correct and is referenced.
Requirement 10	Object	Requirement 10 is not material to planning applications. If it is, this should be explained.	Disagree. The prudent use of resources is a material consideration in the planning system. This is confirmed by government policy contained in PPS1 and other statements. Appendix A provides an overview of the policy context in which the SPD has been prepared and includes details of national and regional policy which relate to the use and impact of materials. Appendix C provides an overview of certified assessment methodologies area which include elements relating to the use and impact of materials.

Coal Authority (Rachael Bust)

Document	Other	No specific comments to make on this document.	Comment noted.
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CTC (National Cyclists' Organisation) (Peter England)

Cyclist Facilities	Support	Pleased the importance of adequate cycle parking facilities is highlighted and that the type of provision is clearly set out.	Support noted.
Requirements and Further Information	Support with conditions	Under the Further Information section correct "Cycle Touring Club" to "CTC (National Cyclists' Organisation)".	Comment noted. The reference has been updated.

Requirements and Further Information	Support with conditions	The CLG/DfT 2007 Manual for Streets should be included as a link.	Comment noted. The reference has been inserted into the section.
Requirement 8	Object	<p>The levels of provision under Requirement 8 are inadequate. While in any one block of flats not all residents may require cycle parking, if two people are sharing a flat and one of the cycles then it is quite likely that both will. The same applies in houses. The allocation of communal spaces may also lead to problems in provision. The requirement should be changed to so that at least two secure cycle parking spaces are allocated specifically to each individual flat and that at least two spaces are provided per house.</p> <p>The provision of visitor cycle parking should be a requirement. This would follow logically from the supporting text which refers to the need for visitor parking.</p>	Agree in part. The reflected standard is taken from the council's adopted parking strategy. The Highways Development Control Team advises that the stated standards continue to be appropriate but the requirement should be amended to "at least" to reflect that a higher provision may be appropriate. Reference to visitor parking has been added to the requirement to ensure consistency with the supporting text.

Highways Agency (Charlotte Barrett)

Document	Other	No comments	Noted.
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Horton Parish Council (Roger Marlow)

Document	Support	Support the documents which are clear, detailed and cover long term issues and sustainability.	Support noted.
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Jacobs Engineering UK Ltd (Joanna Ferguson)

Requirement 6	Support with conditions	Support requirement 6 subject to the addition of "or external features" to the types of development expected to maintain and enhance biodiversity.	Agree in part. It is agreed that developments outside the scope of the consultation draft text can have an impact on biodiversity. The suggested text is considered to be unclear. Notwithstanding this, the recommendation has been amended to refer to all development and to clarify when a dedicated ecological assessment will be necessary to support a planning application.
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Legoland Windsor Park Ltd (via Nathaniel Lichfield and Partners, Rachel Lucas)

1 Introduction	Observation	Paragraph 1.1 confirms "the SPD extends to all forms of development types". It is considered that there are always exceptions requiring consideration on a case by case basis, and this ought to be acknowledged more fully by the document. This point underlies the majority of the points we raise.	Comments noted. It is a general principle of the planning system that exceptions to planning policy and supporting guidance may be made when justified by specific circumstances. No changes are necessary.
Requirement 1	Object	Accept that major schemes will need to meet certain criteria, however the requirement states that "All other applications will be expected to...Demonstrate compliance with this SPD through a dedicated sustainability statement". It is considered the submission of a full Sustainability Statement will not be necessary for all planning applications as depending on the scale and nature of the development; the need to address all the statement's requirements may not be viable or necessary. A more flexible system for more modest schemes. Suggest the requirement is re-phrased to states "all other applications will be expected to...Demonstrate consideration of this SPD".	Disagree. Paragraph 2.5 recognises that non-major applications will be expected to demonstrate compliance with the SPD through Design and Assess Statements, but also recognises that dedicated statements may be necessary in specific circumstances. All robustness of all evidence should be tested as part of the planning application process.
Requirement 2	Object	There should be acknowledge that for some types of development it would not be necessary to provide details of how energy demand is addressed. Consider that a uniform approach should not be adopted and that a more flexible approach should be considered in relation to schemes of such a nature that the requirement would be disproportionately onerous.	Agree in part. Requirement 2 requires development to reach the highest practical standard of sustainable design to reduce energy demand. It is accepted that an energy assessment is unnecessary for all types of applications and accordingly the requirement to undertake an energy assessment has been deleted. Notwithstanding this, attention is drawn to requirement 3 regarding on-site renewable energy generation which will require major developments to undertake an energy assessment as part of the evidence base supporting any planning application.
Requirement 3	Support	Welcomes the recognition that meeting 10% of the energy requirement may not be appropriate for all developments (i.e. that is only expected from major developments.	Support noted.
Requirement 4	Object	Considers the requirements placed on non-residential developments (i.e. to exceed statutory requirements and BREEAM calculations) should relate to major developments only.	Disagree. It is appropriate that developments includes water efficiency measures. However, in line with the principles of reasonableness and proportionality, larger developments are expected to achieve higher levels of sustainability performance than lesser scale developments. Accordingly amendments have been made to the requirement to improve clarity.

Requirement 6	Object	Object to the requirement for all developments to "maintain and enhance biodiversity". This sentence should be rephrased to "maintain or enhance" to provide flexibility for schemes where the impact on the environment is minimal.	Agree. The requirement has been amended accordingly.
Requirement 8	Object	Object to the blanket requirement for all commercial developments to provide 1 cycle space per 10 employees and 1 shower cubicle per 10 cycle spaces. The nature of commercial developments varies considerably and depending on the accessibility of the site as well as existing provision, these levels of requirements may not be necessary. The SPD should take a less uniform approach to the provision of cyclist facilities and consider provision on a case by case basis.	Disagree. The reflected standard is taken from the council's adopted parking strategy. The Highways Development Control Team advises that the stated standards continue to be appropriate as the basis for negotiation.
Requirement 9	Object	This requirement should only relate to major developments consistent with Requirement 12: Pollution.	Disagree. Impacts arising from existing or new activities can greatly influence environmental quality. It is therefore correct that this SPD advises on potential sources of pollution for all scales of development. This is confirmed by government policy contained in PPS23.

May, Rt. Hon. Mrs Theresa

Document	Support	Agree with the principles of the SPD which will ensure the use of fewer resources in future developments and help make the Royal Borough a more sustainable place to live, work and visit.	Support noted.
Document	Support with conditions	There is a need to retain Maidenhead's position as a dynamic and important centre of commerce. Appropriate developments should still be encouraged and not unduly effected by stringent standards.	Support noted. It is a general principle of the planning system that exceptions to planning policy and supporting guidance may be made when justified by specific circumstances. Where the feasibility or viability issues are demonstrated, this may be considered alongside potential benefits of development proceeding. No changes are necessary.
On-site Renewable Energy Generation	Support with conditions	The use and location of technology must be done with careful consideration of the character and history of the location; be it in the countryside or in an urban area.	Support noted. The SPD recognises the advantages and disadvantages of various technologies and does not seek to prescribe any particular approach. Additionally, the requirement expects applicants to consider technologies in light of individual impacts. No changes are required.

Natural England (Marc Turner)

2 Measuring and Demonstrating Sustainability	Support	Welcome the checklist which assists applicants to include evidence on sustainable design and construction. Particularly welcome the advice under the Biodiversity heading which highlights the need for an ecological assessment for developments near areas of known biodiversity interest.	Support noted.
Passive Solar Gain	Support with conditions	Support landscaping paragraphs 3.9 and 3.10 but would emphasise the need to plant native species from local provenance when considering landscaping schemes.	Support noted. References to landscaping within this section refer to the relationship between landscaping and passive solar gain which is unrelated to nativity. The biodiversity section within the SPD already refers to the use of locally native and wildlife friendly species. No changes are required.
Energy Efficiency	Support	Improving energy efficiency is the most effective mitigation measure to reduce greenhouse gas pollution and so conserve the natural environment. Support the measures set out in this section.	Support noted.
On-site Renewable Energy Generation	Support with conditions	Support renewable and clean energy developments in appropriate locations in order to reduce greenhouse gas emissions. In some locations, micro and community scale energy generation schemes can be highly effective with minimal impacts on the environment. We therefore welcome the inclusion of the various energy generating measures discussed in this section but would stress that the impacts of all technologies are dependant on scale and location and that every case will have to be assessed on its merits.	Support noted. The section recognises the advantages and disadvantages of various technologies and does not seek to prescribe any particular approach. Additionally, the requirement expects applicants to consider technologies in light of individual impacts. No changes are required.
Flood Risk Management	Support	Support the introduction of Sustainable Drainage Systems (SUDS) which can include the provision of open space and wildlife habitat around areas of vegetation, water channels and storage ponds. Reed beds or constructed wetlands can also be encouraged.	Support noted.
Biodiversity	Support	Support this comprehensive section. By incorporating ecologically sensitive design and features for biodiversity early on within a development scheme, significant improvements for biodiversity can be achieved, along with easier integration with wider environmental, design and planning aspects.	Support noted.

Biodiversity	Support with conditions	Consider that the SPD should link biodiversity measures to Green Infrastructure. The provision of green infrastructure should be an integral part of the creation of sustainable communities. Networks of multi-functional greenspace providing a wide range of environmental and quality of life benefits should be identified in regional and local plans and designed into all major new development and regeneration schemes from their outset.	Support noted. Paragraph 3.89 of the consultation draft text refers to habitats associated with developments acting as part of a wider network of green spaces.
Biodiversity	Support with conditions	Suggest the following is included to explain how "designing for biodiversity" can assist with climate change adaptation and mitigation. "In seeking to secure the future of England's natural environment in a changing climate, Natural England's particular focus is in increasing the ability of landscapes and ecosystems to adapt to climate change. Enhancing and extending natural habitats is essential in preparing for climate change. Habitat fragmentation must be reduced and connections for wildlife across the landscape should be created which will assist with the migration and adaptation of species as the climate fluctuates".	Agree. Paragraph 3.89 of the consultation draft text has been amended to refer to the part habitat connectivity plays in allowing the migration and adaptation of species to climate change.

Radian Group (Karen MacDonald)

Document	Support	Support the SPD.	Support noted.
Document	Object	All new residential developments of more than 10 units should require a travel plan.	Disagree. Paragraph 1.2 states that this does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. Travel impacts is currently considered by the adopted Planning Obligations and Developer Contributions SPD. Travel plans are required for all non-residential applications considered likely to generate significant impact on traffic flow or the use of public transport. All types of application are expected to make a contribution towards travel and public transport commensurate with the impacts of the proposal.
The Purpose of this SPD	Support	Support the objectives fully.	Support noted.
3 Sustainable Design	Object	"Passive" methods should be encouraged to achieve Code 3 without the need for renewables.	Disagree. It is accepted that energy efficiency, including the use of passive systems is fundamental to reducing environmental impact, however the Code for Sustainable

			Homes is a nationally accredited appraisal system which is outside the scope of this SPD.
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Rayner Family Trust (via West Waddy ADP, Steve Pickles)

The Purpose of this SPD	Object	Object to the omission of specific guidance for historic buildings. It is essential that standards are clear. It is not appropriate to refer the reader to a third parties document of which content may not be endorsed by the Council.	Disagree. The diversity and complexity of historic buildings make standard guidance impractical. The statement box within Section 1: Introduction states that applicants should seek advice from the council's Conservation Team on the acceptability of measures relating to buildings within conservation areas and listed buildings.
Requirement 1	Object	Requirement 1 cannot be applied to the conversion of buildings since both BREEAM and the Code for Sustainable Homes relate to new build and do not apply directly to conversions.	Agreed. Requirement 1 has been amended to refer to major applications involving the construction of dwellings or non-residential buildings.
Requirement 1	Object	Requirement 1 states that all developments involving 10 or more dwellings will be expected to meet the Code for Sustainable Homes Level 3 or above. This will be mandatory under Building Regulations from April 2010. Paragraph 11 of the Supplement to PPS1 states that "controls under the planning, building control and other regulatory regimes should complement and not duplicate each other." As this requirement will shortly be duplicated by the Building Regulations it is not considered to be necessary.	Disagree. Planning and Climate Change, the supplement to PPS1, sets out the government's expectations of planning authorities on reducing emissions and stabilising climate change and taking into account the unavoidable consequences. Planning authorities should amongst other matters design to limit carbon dioxide emissions and use opportunities for decentralised and renewable or low carbon energy. While it is a stated principle that controls under the planning, building regulation and other regulatory systems should complement and not duplicate each other, this PPS and others make it clear that standards in advance of building control can be justified through the planning system. South East Plan Policy CC4 confirmed this position.
Requirement 2	Object	It is not clear whether Requirement 2 applies to the re-use of buildings or not.	Requirement 2 refers to all development. Since material changes in the use of a building or land falls within the definition of development, it is clear that this requirement would apply. No changes are required.
Requirement 2	Object	There is a lack of precision in Requirement 2, where it is stated that "all developments will be expected to achieve the highest standards of design to reduce energy demand throughout the lifetime of the development", but there is no indication as to how the Council will determine whether or not "the highest practical standards of design" have been achieved.	Disagree. Requirement 2 expects developments to reach the highest practical standard of sustainable design to reduce energy demand. It is appropriate that all developments consider their environmental impacts in line with the principles of reasonableness and proportionality. While no measurable standard has been set, the approach reflects the now superseded Berkshire Structure Plan policy

			for energy efficiency and policies within the South East Plan both of which were subject to examination. The council offers a pre-application advice service for those wishing to gain formal advice on the acceptability of potential developments.
Requirement 2	Object	<p>Requirement 2 imposes onerous demands on smaller developments prior to the submission of a planning application. The requirement should be amended by:</p> <p>i) Making it simpler.</p> <p>ii) Applying a threshold to limit demands on small developments.</p> <p>iii) Enabling the submission of information in compliance with a condition.</p>	Agree in part. Requirement 2 requires development to reach the highest practical standard of sustainable design to reduce energy demand. It is accepted that an energy assessment is unnecessary for all types of applications and accordingly the requirement to undertake an energy assessment has been deleted. Notwithstanding this, attention is drawn to requirement 3 regarding on-site renewable energy generation which will require major developments to undertake an energy assessment as part of the evidence base supporting any planning application.
Requirement 3	Object	<p>Some requirements set out in the SPD may be onerous and prevent needed developments proceeding.</p> <p>Paragraph 33 of the Supplement to Planning Policy Statement 1 on Planning & Climate Change states that: "Any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD, not a supplementary planning document, so as to ensure examination by an Independent Inspector. In doing so planning authorities should:</p> <p>- ensure what is proposed is evidence based and viable having regard to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities".</p> <p>This advice is also repeated and expanded upon in Policy CC4 on Sustainable Design and Construction in the Proposed Changes to the South East Plan which states "when proposing any local requirements for sustainable buildings, local planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this and set them out in Development Plan Documents".</p>	Disagree. This requirement supplements South East Plan Policy NRM11 which is part of the statutory development plan for the region. The council has not sought to vary from this policy and there is no conflict regarding the PPS1 guidance. No changes are required.

		The Council is seeking to introduce these requirements through an SPD contrary to Government advice.	
Requirement 4	Object	It is not clear whether Requirement 4 applies to the re-use of buildings or not.	<p>Disagree. It is appropriate that developments includes water efficiency measures. However, in line with the principles of reasonableness and proportionality, larger developments are expected to achieve higher levels of sustainability performance than lesser scale developments. Accordingly amendments have been made to the requirement to improve clarity.</p> <p>Requirement 4 refers to development involving the creation or replacement of dwellings and non-residential floorspace. Since material changes in the use of a building or land falls within the definition of development and that new dwellings and non-residential floorspace can be created through change of use, it is clear that this requirement would apply. No changes are required.</p>
Requirement 4	Object	<p>There is a lack of reference to the local circumstances that warrant requirements in the draft SPD.</p> <p>Requirement 4 states that "residential developments will be expected to achieve a per capita consumption of potable water of 120 litres per person per day" but no explanation is given as to how this standard has been selected or how it relates to current per capita consumption. Other requirements are unclear as no precise standard is set. Water resource management, "non-residential developments are expected to exceed statutory requirements and indicate what percentage improvement beyond this minimum requirement is likely to be achieved" but no justification is provided as to why statutory requirements need to be exceeded and by how much to comply with the requirement.</p>	Agree in part. Notwithstanding the environmental benefits of water efficiency, the introduction to this section has been amended to reflect the sensitivity of water supply within the Royal Borough. The standard is taken from the basic level required under the Code for Sustainable Homes. Unlike dwellings, there are no standard consumption requirements for non-residential dwellings. Requirement 4 therefore seeks an improvement against statutory requirements. The percentage improvement would form a material consideration in the determination of planning applications.
Requirement 7	Object	It is unclear whether Requirement 7 applied to the re-use of buildings or not.	Requirement 7 refers to all development. Since material changes in the use of a building or land falls within the definition of development, it is clear that this requirement would apply. No changes are required.
Responsibly Sourced and Recycled Materials	Object	Reference should be made to the refurbishment and re-use of older buildings.	Agree. While paragraph 1.8 already refers to the retention and re-use of quality buildings, it is agreed that this would

			be usefully reinforced by an amendment to paragraph 4.3.
Requirement 10	Object	<p>Paragraph 45 of the Supplement to PPS1 on Planning & Climate Change, states that;</p> <p>"Planning conditions or planning obligations can be used to secure the provision and longer-term management and maintenance of those aspects of a development required to ensure compliance with the Policies in this PPS". The necessary information to meeting Requirement 10 on responsibly sourced and recycled materials should be provided in compliance with conditions.</p>	Disagree. Requirement 10 states that the use of responsibly sources and recycles materials is encouraged and will be a material factor in the determination of planning applications. Since no specific standard is set there is no requirement for an applicant to provide details on materials, however, should the applicant place reliance on such matters to support the acceptability of the proposed development, then such detail would need to be provided with the submission of the planning application. No changes are required.
Site Waste Management	Object	Reference should be made to the refurbishment and re-use of older buildings. Does the figure for waste in paragraph 4.11 relate to the South East? Paragraph 4.13 refers to the re-use of quality buildings but quality is undefined. Does this include buildings currently in a state of disrepair or only buildings of architectural design?	Disagree. The section relates to construction waste where buildings are not retained for future use. The age of buildings is not material to this section. The figure in 4.11 is clearly sourced to the Waste Strategy for England.
Requirement 11	Object	<p>Paragraph 45 of the Supplement to PPS1 on Planning & Climate Change, states that;</p> <p>"Planning conditions or planning obligations can be used to secure the provision and longer-term management and maintenance of those aspects of a development required to ensure compliance with the Policies in this PPS". The necessary information to meet Requirement 11 for a site waste management plan should be provided in compliance with conditions.</p>	The use of planning conditions to require actions subsequent to the formal grant of planning permission is recognised. The requirement for a Site Waste Management Plan is a matter that can be controlled by planning condition. The SPD does not require the upfront submission of this information. No changes are required.
Requirement 12	Object	<p>Paragraph 45 of the Supplement to PPS1 on Planning & Climate Change, states that;</p> <p>"Planning conditions or planning obligations can be used to secure the provision and longer-term management and maintenance of those aspects of a development required to ensure compliance with the Policies in this PPS". The necessary information to meet Requirement 12 for Site Environmental Management Plans should be provided in compliance with conditions.</p>	The use of planning conditions to require actions subsequent to the formal grant of planning permission is recognised. The requirement for Site Environmental Management Plan is a matter that can be controlled by planning condition. The SPD does not require the upfront submission of this information. No changes are required.

South East England Partnership Board (formerly the South East England Regional Assembly) (Catriona Riddell)

Document	Support	The Supplementary Planning Document is in general conformity with the adopted Regional Spatial Strategy and also with the Secretary of State's Proposed Changes to the draft South East Plan.	Support noted.
Document	Observation	The government has announced that a code for non domestic buildings is being produced that will seek to make all new non domestic developments zero carbon by 2019. To help future proof the SPD, reference should be made to the emerging policy framework.	Comments noted. It is the intention that the SPD be regularly updated to reflect changes in policy, best practice and technology. No changes are required to the SPD at this time.
Energy Consumption	Observation	<p>It would be helpful to include reference to the national timetable for reducing carbon dioxide emissions and compliance with Part L of the building regulations under requirement 2.</p> <p>Consideration needs to be given to how the energy efficiency improvements are going to be delivered, especially on smaller sites. On-site renewables cannot always be delivered and S106 contributions will be required to deliver off-site carbon dioxide reductions, for example a carbon offset fund. The presumption should be for on site energy as set out under requirement 3, but reference to all appropriate delivery mechanisms should be made in the SPD.</p>	<p>Agree. Amendments have been made to paragraph 3.3 to refer to the governments timetable to amend Building Regulations to achieve greater energy efficiency and ultimately zero carbon performance.</p> <p>Comments noted. It is the intention that the SPD be regularly updated to reflect changes in policy, best practice and technology. Matters such as carbon offsetting can be considered in future revisions and through other parts of the LDF. No changes are required to the SPD at this time.</p>
Requirements and Further Information	Observation	Include reference to South East Plan Policy NRM12: Combined Heat and Power under Requirement 3.	Agree. The reference has been inserted.
Requirements and Further Information	Observation	Include reference to South East Plan Policy CC8: Green Infrastructure under Requirement 6.	Agree. The reference has been inserted.

Surrey County Council (Richard Evans)

Document	Support	Considers the SPD to be a comprehensive piece of work. Have no concerns or comments.	Support noted.
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Sustrans (John Ashford)

Document	Support	Support presentation and proposals.	Support noted.
Section: Secure Cycle Storage	Observation	Flats and apartments need carefully specified cycle storage as they lack utility spaces. Storage should allow two cycles to be stored per unit to accommodate partners and dependents.	Agree in part. The reflected standard is taken from the council's adopted parking strategy. The Highways Development Control Team advises that the stated standards continue to be appropriate but the requirement should be amended to "at least" to reflect that a higher provision may be appropriate. Reference to visitor parking has been added to the requirement to ensure consistency with the supporting text.
Section: Secure Cycle Storage	Support	Strongly endorse paragraph 3.110 which provides criteria to be met by secure cycle parking.	Support noted.
Requirement 8	Support with conditions	<p>Requirement 8 should be amended to incorporate: "Residential flats: two cycle spaces per dwelling; and"</p> <p>Make specific reference to the Department for Transport manual of guidance "Cycle Infrastructure Design" (November 2008).</p>	Agree in part. The reflected standard is taken from the council's adopted parking strategy. The Highways Development Control Team advises that the stated standards continue to be appropriate but the requirement should be amended to "at least" to reflect that a higher provision may be appropriate. Reference to visitor parking has been added to the requirement to ensure consistency with the supporting text.

Thames Valley Police (Michael Clare)

Document	Object	<p>There is only minimal reference to crime in relation to sustainability. While mention is made to secure cycle storage there is no other mention to other crime reducing strategies.</p> <p>There is an increasing focus on issues of health, crime and the local environment. These issues can be addressed to the benefit of future users through initial building design and development control processes, e.g. parked cars, alleyways cause regular concern for residents. Attention drawn to statements within PPS1: Delivering Sustainable Development, PPS3: Housing and the companion guide, PPS6: Planning for Town Centres, Circular 01/2006 and the Crime and Disorder Act 1998.</p> <p>Attention is drawn to Secure By Design (SBD) which offers</p>	Agree in part. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of crime within overall design falls outside the scope of this SPD, however, it is agreed that it would be beneficial to provide greater cross-reference within specific sections to matters such as natural surveillance that have implications for the layout and internal use of developments.
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		advice on crime prevention and has been shown to reduce level of crime between 40-75%. SBD award Part 1 refers to layout. Part 2 refers to physical security. It is important of getting SBD standards applied through a development as retrofitting is expensive. Uplifting security measures to SBD standard has been estimated as £480-£730.	
Document	Observation	Thames Valley Police administer and carry out a final site visit on building completion for the area regarding the Secured By Design award. Statistics can be provided on the number of SBD applications and passes in a year.	Comments noted. This information has been passed to the research and monitoring officers for their information and consideration.

Thames Water (David Wilson)

Water Resource Management	Support	The promoting and adoption of water efficient practice in new development will help Thames Water to manage demand and work towards sustainable development. Generally support the paragraphs of water efficiency.	Support noted.
Water Resource Management	Object	<p>The SPD should cover the requirement for water and sewerage infrastructure as this is essential to avoid unacceptable impacts on the environment such as sewage flooding of property, pollution of land and watercourses, and water shortages.</p> <p>Thames Water supports the inclusion of a Foul Sewage and Utilities Statement on the local list of documents required in the validation of planning applications. This would include a letter from the utility company stating that capacity exists within its network or confirmation that agreements have been signed for the provision of the necessary infrastructure.</p>	Disagree. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of infrastructure capacity falls outside the scope of this SPD. Notwithstanding, it should be noted that paragraph 3.66 recognises the overwhelming of drains and sewers as a source of flooding. When statutory providers raise capacity issues, and arrangements are not in place for their resolution, the council can consider replacing restrictions on the implementation of the development or, when necessary, refuse planning permission.
Flood Risk Management	Object	<p>PPS25: Development and Flood Risk states at paragraph 16 that a sequential approach should be used in areas at risk from forms of flooding other than from rivers and sea. Annex C lists the forms of flooding and includes: "Flooding from Sewers" and this should be recognised in the SPD.</p> <p>Sewers should be assumed to surcharge to just below cover level and as such basement areas without pumped drainage systems would be at greater risk of internal flooding. Part H of the Building Regulations recognises this</p>	Disagree. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of infrastructure capacity falls outside the scope of this SPD. Notwithstanding, it should be noted that paragraph 3.66 recognises the overwhelming of drains and sewers as a source of flooding. When statutory providers raise capacity issues, and arrangements are not in place for their resolution, the council can consider replacing

		<p>and it should be incorporated as part of the SPD.</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of flats, oils and grease the collection of waste oil by a contractor particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses due to blocked sewers.</p>	restrictions on the implementation of the development or, when necessary, refuse planning permission.
Requirement 5	Object	<p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers. However, it should also be recognised that SUDS are not appropriate in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>With regard to surface water drainage, we consider that the following paragraph should be included within the SPD: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is a major contribution to sewer flooding."</p>	Disagree. Paragraph 3.71 recognises that the appropriate SUDS techniques will depend on the soil conditions and hydrology of the site with specific mention made to permeability. There are three groups of SUDS. Source control techniques and passive treatment systems may still be suitable in locations where permeable conveyance systems would be unsuitable. Paragraph 3.72 refers to the need for long-term maintenance arrangements to ensure the success of SUDS techniques.

Theatre Trust (Rose Freeman)

Document	Other	The contents do not directly relate to the Theatres Trust's remit.	Comment noted.
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Wardour Lodge Estates Ltd (David Grant-Adamson)

Document	Support	The document sets out a wide variety of requirements, issues and responsibilities in a very clear and thorough way.	Support noted.
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Windsor and Eton Society (Karin Lohr)

Document	Observation	The Council should provide more literature, hold exhibitions and expand the Learning for Sustainability programme to	Comments noted. While these actions fall outside the scope of the SPD, the comments have been passed to
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		help residents improve the environment themselves, e.g. advice on landscaping.	appropriate teams for their information and consideration.
Document	Support	Support the three aims of: a) protecting and enhancing the quality of the environment; b) education of society in sustainable development; and c) ensure savings are made to give stable and productive economy.	The three aims are taken from PPS1 which forms part of the context for the SPD. The objectives of the SPD itself are set out under paragraph 1.11.
Section: The Purpose of this SPD	Support	Support the sustainability performance of buildings and spaces but regard must be given to aesthetic appearance, particularly in conservation areas.	Support noted. The box under paragraph 1.11 specifically refers to the need to gain advice from the council's Conservation Team when considering applications on listed buildings or within Conservation Areas.
Section: Permeable Surfaces	Support	The use of permeable surfaces will assist the flow of water.	Support noted.
Section: Requirements and Further Information	Support	Fully concur with the statement that "all developments involving changes in floorspace will be expected to maintain and enhance biodiversity."	Support noted.
Section: Waste, Recycling and Composting Facilities	Observation	Waste management is a key factor and incentives are needed to ensure people recycle properly.	Comments noted.
Section: Cyclist Facilities	Observation	Improvements to the public integrated transport system, provision of additional cycle lanes and secure motorbike/bicycle parking might encourage people to change the way that travel and reduce pollution.	Comments noted.
Section: Site Waste Management	Observation	Waste management is a key factor and incentives are needed to ensure people recycle properly.	Comments noted.

Wm Morrison Supermarkets Plc (via Peacock and Smith, Gareth Glennon)

Requirement 1	Object	<p>Objects to the provisions of Requirement 1 that all new major development should conform to BREEAM standard "very good". The Council has not consulted with all sectors of industry to confirm whether the BREEAM standard "excellent" is achievable or realistic, and therefore we consider that it does not meet soundness test 7.</p> <p>The requirement must incorporate flexibility to ensure that it does not represent an unreasonable burden on companies, jeopardise investment, regeneration and employment</p>	Disagree. Planning and Climate Change, the supplement to PPS1, sets out the government's expectations of planning authorities on reducing emissions and stabilising climate change and taking into account the unavoidable consequences. Planning authorities should amongst other matters design to limit carbon dioxide emissions and use opportunities for decentralised and renewable or low carbon energy. South East Plan Policy CC4 expects the adoption of sustainable construction standards and techniques.
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		creation. Requirement 1 should be modified by inserting text to confirm that the requirement to meet the BREEAM standard "very good" will be subject to tests of viability and suitability.	<p>The consultation draft SPD was publicised to a wide range of stakeholders, including representatives of the development industry. The council is aware of developments within the Royal Borough that has reached BREEAM "very good". The requirement does not expect developments to reach "excellent" in standard. Soundness test 7 has been superseded by PPS12 and applies to DPDs.</p> <p>It is a general principle of the planning system that exceptions to planning policy and supporting guidance may be made when justified by specific circumstances. Notwithstanding this, a statement has been added within Section 1: Introduction to clarify what is expected of developers in the event of feasibility or viability issues.</p>
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Wraysbury Parish Council

Document	Object	The 30m ² allowance in footprint under Local Plan Policy F1 should be enforced. Suggests the change: "no further development shall be permitted in the flood plain until flood mitigation measures have been satisfactorily dealt with."	Disagree. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of acceptability of development with regard to in principle flood risk is outside the scope of this SPD.
Document	Object	Any loss of Green Belt land is unsustainable as it deprives future generations who are dependant on this resource for their health and well-being. Suggest the change: "there shall be no roads or industrial buildings sited in the Green Belt as this compromises the health and well-being of future generations."	Disagree. Paragraph 1.2 states that this SPD does not cover all aspects of sustainability with issues such as location, land use and transport considered by adopted policy and in time by other parts of the LDF. The consideration of development requirements, and any potential implication for Green Belt land is outside the scope of this SPD.

APPENDIX D DRAFT SA REPORT: SUMMARY OF COMMENTS AND OUTCOME

Horton Parish Council

Document	Support	Support SA Report.	Noted
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Natural England

Section 4.4 (Requirement 3: On-site Renewable Energy Generation)	Support with conditions	Agree with the statement “ <i>there could also be a negative effect on townscape, the countryside, natural and historic environment, if renewable energy measures lead to eyesores or adverse changes in the character of buildings or spaces</i> ”. Support renewable and clean energy developments in appropriate locations. Need to stress that the impact of all technologies are dependant on scale and location and every case will have to be assessed on its merits.	Support noted.
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Radian

Document	Support	Support SA Report.	Support noted.
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Wraysbury Parish Council

Document	Object	Building on the floodplain is not sustainable and does not support any of the criteria of sustainability since the negative cumulative effects of putting more concrete in the ground reduces the ability of the flood plain to store flood water thereby compromising the flood plain in the long term and increasing flood risk.	Disagree. The purpose of this SA Report is to appraise the requirements of the SPD. The SPD is not concerned with location – and does not support any development which is not acceptable in principle by other planning policy, notably flood risk policy. The SA Report therefore found that the SPD performs well against SA objective 14 (flood risk), since certain developments that go ahead throughout the borough (in accordance with the Core Strategy) will be required to manage flood risk. No changes made to the SA Report.
Document	Object	There is nothing in the SA Report which mentions protecting the Green Belt even though Green Belt was included in the Core Strategy and Policies: Draft SA Report (2006).	Disagree. The purpose of this SA Report is to appraise the requirements of the SPD. The SPD is not concerned with location – and does not support any development which is not acceptable in principle by other planning policy, notably Green Belt policy. The protection of the Green Belt will need to be considered in the SA Report for the

			new Core Strategy. No changes made to the SA Report.
Section 3.7	Support	Agree that the preferred option should be Option B – to develop a new Sustainable Design and Construction SPD in which there is adequate protection for the Green Belt and flood plain to ensure the highest possible standards of sustainability.	Support noted.