



Warwick District Council

Sustainable Buildings Supplementary Planning Document Background Documents

**John Archer
Head of Planning**

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Statement of SPD Matters

Title of SPD:

Sustainable Buildings

Subject Matter:

This SPD expands upon policies DP11 (Drainage), DP12 (Energy Efficiency) and DP13 (Renewable Energy Developments) of the Warwick District Local Plan 1996 – 2011.

Area Covered:

Warwick District

The period within which representations should be made

Representations must be made between 29th August 2008 and 10th October 2008.

The Address to which and the Person to whom representations should be made:

Claire Parlett
Planner (Policy, Projects and Conservation)
Warwick District Council
P O Box 2178
Riverside House
Milverton Hill
Royal Leamington Spa

Electronic versions of the Representation form can be downloaded from the Council website:

www.warwickdc.gov.uk/sustainablebuildings

Electronic versions of the Representation Form should be sent to:

ldf@warwickdc.gov.uk

Any representations may be accompanied by a request to be notified at a specified address of the adoption of the SPD.

The documents can be viewed on the Council's website or at any of the locations listed below.

The Council Offices: Riverside House, Milverton Hill, Royal Leamington Spa

The Town Hall: Parade, Royal Leamington Spa

Monday – Thursday 8.45 am – 5.15 pm; Friday 8.45 am – 4.45 pm

Warwickshire Direct - Whitnash: Whitnash Library, Franklin Road, Whitnash
Monday and Friday 9.30am – 5.30pm, Tuesday and Thursday 9.30am – 7pm, Wednesday
10.30am – 5.30pm, Saturday 9.30am – 12.30pm

Leamington Spa Library: The Pump Rooms, Parade, Royal Leamington Spa
Monday and Thursday 9.30 am – 8.00 pm; Tuesday 10.00 am – 8.00 pm; Wednesday and
Friday 9.30 am – 5.00 pm; Saturday 9.30 am – 4.00 pm; Sunday 10.00 am – 2.00 pm

Warwickshire Direct – Warwick: Shire Hall, Market Square, Warwick
Monday to Thursday 8.00am – 5.30pm, Friday 8.00am – 5.00pm, Saturday 9.00am –
4.00pm

Warwickshire Direct - Kenilworth: Kenilworth Library, Smalley Place, Kenilworth
Monday and Thursday 9.00 am – 7.00 pm; Tuesday and Friday 9.00 am – 5.30 pm;
Wednesday 10.30 am – 5.30 pm; Saturday 9.00 am – 4.00 pm

Lillington Library: Valley Road, Royal Leamington Spa
Monday and Friday 9.30 am – 1.00 pm & 2.00 pm – 5.30 pm; Tuesday and Thursday 9.30
am – 1.00 pm & 2.00 pm – 7.00 pm; Saturday 9.30 am – 4.00 pm

The Chain Community Office: Crown Way, Lillington, Royal Leamington Spa
Monday and Friday 10.00 am – 12.00 am; Tuesday 11.00 am – 12.00 noon; Wednesday
1.00 pm – 3.00 pm; Thursday 9.30 am – 12.00 noon

Brunswick Healthy Living Centre: 98-100 Shrubland Street, Royal Leamington Spa
Monday - Thursday 9.00 am – 5.00 pm; Friday 9.00 am – 4.30 pm

John Archer
Head of Planning
Warwick District Council
The Council Offices
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

Statement of Consultation for the Sustainable Buildings Supplementary Planning Document (SPD)

Pre consultation

- 1.1 This statement sets out the consultation which was undertaken by the Council in preparing the Sustainable Buildings Supplementary Planning Document (SPD).

Focus Group with Council Officers

- 1.2 A meeting was held with Council officers from Development Control, Conservation and Building Control and the Head of Planning to discuss the scope of the SPD. The approach of the SPD was generally thought to be a clear framework through which to determine applications.
- 1.3 A number of specific issues were raised.
- The SPD should include a section on 'Obtaining Planning Permission'
 - Stage 1 of section 5 should be strengthened to clarify that the Council will not accept energy efficiency measures as sufficient in meeting the 10% requirement.
 - There should be an additional paragraph in section 6 to highlight that in some instances the most suitable layout for encouraging passive solar gain may not accord with other design principles.
 - The need to ensure disabled access in accordance with building regulations when using porous paving should be highlighted.

Core Strategy Issues Consultation

- 1.4 As part of preparing the Core Strategy, the Council undertook an issues questionnaire which was completed by 89 respondents. The questionnaire asked respondents to comment on whether the key objectives of the strategy should be high, medium or low priority. In relation to securing a more Sustainable District, 85% of respondents considered renewable energy to be of high or medium importance and 90% considered encouraging new development to reduce energy and water consumption to be of high or medium importance. This shows there is clear public support for the objectives of this SPD.

Sub Regional Renewable Energy Group

- 1.5 The Council has undertaken work on renewables with other authorities at a sub regional level. It is anticipated that a joint renewables toolkit (which will accompany this SPD) will be produced to provide up to date energy data and a mechanism for calculating the 10% requirement. The discussion and feedback from this group have also fed into the SPD.

Best Practice and Training

- 1.6 The Council also considered similar SPDs from other local authorities including those considered to be best practice and wider government guidance also informed the production of the draft SPD. The SPD was also informed by a series of professional conferences and training courses on renewable energy.

Consultation on the Draft SPD and SA

- 1.7 The Draft Sustainable Buildings SPD and the Sustainability Appraisal were approved by the Council's Executive on the 16th July 2008 for public consultation. A six week period of public consultation was carried out between the 29th August 2008 and 10th October 2008.
- 1.8 The Draft SPD, background documents and representations forms were made available at 9 deposit points across the district which included Riverside House, libraries and one stop shops. The documents were also placed on the Council's website. Letters were sent out to a list of statutory consultees, interested groups and those who had responded to the SA Scoping Report. A notice advertising the consultation period was published in the local newspaper.
- 1.9 Representations were made by 24 respondents over the six week period. These included:
- 4 individuals
 - 5 town and parish councils
 - 3 Organisations
 - 4 Cllrs / Political groups
 - 5 Statutory Organisations
 - 3 Commercial Organisations
- 1.10 The majority of representations were generally supportive of the SPD and its objectives. A number of comments were made suggesting that the requirement for renewable energy should be higher than 10% and that the guidance on sustainable drainage and energy efficiency should be stricter. Whilst this would be encouraged, it is noted that this would go beyond existing requirements set out in Local Plan Policies DP11, DP12 and DP13 and therefore render the SPD unsound.
- 1.11 It was also suggested by respondents, that by applying the 10% requirement to all developments, the SPD was contrary to RSS (Preferred Option) policy SR3 and Local Plan Policy DP13. In response, it was pointed out that the SPD seeks to clarify what is meant by 'in appropriate residential and non residential circumstances'. The policy is applied to all developments **unless** it can meet one of the criteria set out in section 4 **and** has been designed to a high level of energy efficiency. This allows for instances where the installation of renewables would not be feasible, would conflict with other planning objectives or would be financially unviable and would undermine the delivery of the development.
- 1.12 It was suggested that more emphasis should be given to the contribution of energy efficiency measures in reducing carbon emissions. There is concern that the SPD

- 1.13 Objections were also made to detailed aspects of the framework for calculating the 10% requirement and the content of the Energy Statement. A number of minor changes were made to clarify and expand upon the requirements.
- 1.14 In addition to the above a number of other changes to the structure and wording were made to the SPD to reflect internal consultation, updated and additional policy guidance and to address any typographical errors.

Sustainability Appraisal: Non Technical Summary

Please note that the full Sustainability Appraisal is available for inspection at the deposit points (see the Statement of SPD Matters at the front of this document) and on the Council Website at: www.warwickdc.gov.uk/sustainablebuildings

- 1 This is the Sustainability Appraisal (SA) Report to the Sustainable Buildings Supplementary Planning Document (SPD). The SPD expands upon Local Plan Policies DP11 (Drainage), DP12 (Energy Efficiency) and DP13 (Renewable Energy Developments). As these policies have already been the subject of an SA this report concentrates on the additional guidelines and advice which will be included within the SPD.
- 2 The purpose of a Sustainability Appraisal is to promote sustainable development by taking into account the social, economic and environmental effects of planning policies.
- 3 This document builds on the work in the **Scoping Report** produced in March 2008 which set out the **Sustainability Framework** within which the SPD is appraised. This document applies that framework to the SPD. In addition to setting out the appraisal framework, the Scoping Report also presented the following information:
 - A summary of relevant plans, policies and programmes
 - A set of indicators, baseline data and targets or comparators (relevant to the whole of the LDF); and
 - A summary of sustainability issues
- 4 The **Sustainability Issues**, or aims, in relation to the Sustainable Buildings SPD are identified as follows:
 - To promote a cleaner and greener environment
 - Ensuring the reliability of energy supplies
 - An integrated Approach
 - Water Conservation
 - Achieving Zero Carbon Housing
 - Meeting the Renewables Obligation
 - Micro generation
 - Promoting Renewable Energy Sources
 - Protection of the Historic Environment
 - Monitoring
 - Establishing a Threshold
- 5 The appraisal process proceeds alongside the preparation of the SPD. It involves testing the aims of the SPD, and any policy options against the Sustainability Objectives. Where there is likely to be a conflict between the SPD and the Sustainability Objectives the SA should describe how this will be dealt with.
- 6 There are 18 **Sustainability Objectives** which fall into 4 categories
 - Sustainable Consumption and Production
 - Natural Resource Protection and Environmental Enhancement

- Climate Change and Energy
 - Sustainable Communities
- 7 The Sustainability Appraisal found that the majority of Sustainability Objectives and SPD aims are compatible or have no interrelationship. A potential conflict was identified between promoting renewable energy technologies and protecting and enhancing the historic environment.
 - 8 Two options are appraised in this Sustainability Appraisal:
Option 1: Prepare an SPD
Option 2: Rely on Existing Local Plan Policies and Government Guidance
 - 9 Each option is assessed for positive, negative or neutral effects against the Sustainability Objectives. Both options performed well having no significant negative impacts however option 1 performed slightly better than option 2.
 - 10 This is because an SPD would provide further guidance on the different types of drainage systems, energy efficiency measures and renewable energy equipment and how these can be integrated into building design. In bringing together these issues it encourages an integrated approach to sustainable construction which is likely to maximise the potential to reduce carbon emissions.
 - 11 It would also provide a clear framework through which to meet the 10% requirement for renewable energy and clarify in what circumstances the requirement will be sought. This is likely to increase the amount of renewable energy brought forward through new development. In providing specific advice on implementing renewables on listed buildings and in Conservation Areas an SPD could minimise the impact on the historic environment.
 - 12 Whilst policies DP11, DP12, and DP13 provide a strong basis for encouraging sustainable construction, in the absence of further guidance it is possible that a piecemeal approach will be adopted where policies are considered separately. DP11 and DP12 encourage rather than require the use of sustainable drainage systems and energy efficiency measures which could mean they are given limited weight by applicants. Without clarity of what constitutes the appropriate circumstances in DP13 it is possible that few developments will meet the requirement. It was therefore concluded that option 1 is likely to bring the most benefits in terms of the sustainability objectives.
 - 13 The SA sets out how any potential impacts of the SPD will be addressed and provides recommendations for enhancing its beneficial effects. For example, the SPD will mitigate against the potential adverse impact of DP12 and DP13 on the historic environment. The production of a renewables toolkit (which would accompany the SPD) to provide baseline energy data and a mechanism for calculating the 10% requirement will maximise the effects of the SPD.
 - 14 Chapter 8 sets out the ways the Council will monitor the sustainability effects of the SPD. The baseline data will be monitored on a yearly basis through the Annual Monitoring Report and if the situation appears to be worsening the Council will review the content and scope of the SPD.

15 Finally chapter 9 summarises the public consultation exercise. A number of changes were made to the Sustainable Buildings SPD to improve the structure, wording and clarity of the document in response to representations made through the consultation exercise. Further amendments were made to reflect internal consultation, updated guidance and to address any typographical errors. In the Council's opinion these are all minor amendments which do not require appraisal through the SA process. There were no objections to the structure or content of the Draft Sustainability Appraisal.