
Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [22: Appendix 2: Draft policies: Energy Management in New Developme...

Respondent Name	User Response: Text	Response Created
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>If, as stated, the built environment accounts for 40% of greenhouse emissions in the UK, surely the answer is to build less!!</p> <p>We support the view that there must be a cohesive plan, with the impact on the environment of all aspects of the built environment - materials/ construction methods/ occupation/ transport impacts of journeys to work/ leisure/ shopping activities, etc.</p> <p>We understand an average new-build house consumes over 50 tonnes of Co2 in its construction. This area requires urgent action. The suggested inclusion of carbon off-setting measures are a 'cop-out'.</p> <p>We understand the plan, but developers must be enforced to offer occupants of new homes a warranty that their property reaches the desired levels of compliance - only then will standards in housebuilding construction be addressed sufficiently to improve the quality of new-build properties to the levels that will ensure compliance with the increased stringent requirements.</p> <p>In the light of the disgusting denial of responsibility for adequacy of the products and installation methods at Grenfell Tower, will the new policy advocate a return to Local Authority control of Building Regulation requirements??</p> <p>Presumably there will be alternative arrangements for already constructed buildings, and that Historic Buildings would be exempt from the draft proposals?</p> <p>To achieve the levels projected in the existing housing stock will require drastic investment - heating system replacement/ increased insulation/ smart appliances/ solar generation. etc etc.</p>	26 Feb 2021
Andrew Stacey	To use Eco energy as much as possibly	08 Feb 2021
Angela Chapman	Energy management is important, but if everybody goes to electric everything, where's the electricity coming from? We don't make sufficient now. Better option and would be sustainable is hydrogen seeing we have so much of it! The large and unsightly wind turbines are started by electricity! Hardly worthwhile .	23 Feb 2021
Angela Crabtree	Please see the Trapp'd Response. (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Angie Carroll - Parish Council	Be clear about what energy you want to have in SG	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021

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Ashfield Land	No comments.	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	<p>The Government consulted on plans for the Future Homes Standard, including proposed options to increase the energy efficiency requirements for new homes in 2020. The Future Homes Standard, which is to be introduced by 2025, will require new build homes to be future-proofed with low Carbon heating and world-leading levels of energy efficiency. The Government proposes that Building Regulations Standards will be uplifted as a steppingstone towards the Future Homes Standard, and in particular towards future-proof homes with low Carbon heating.</p> <p>Responding to the consultation on the Future Homes Standard, the Government recently (19th January 2021) set out plans to improve the energy performance of new homes, with all homes to be highly energy efficient, with low Carbon heating and be zero Carbon ready by 2025. These homes are expected to produce 75 - 80% lower Carbon emissions compared to current levels. To ensure the development industry is ready to meet the new standards by 2025, new homes will be expected to produce 31% lower Carbon emissions from 2021.</p> <p>In light of the recent Government announcement, made subsequent to the publication of the Consultation Document, the identified policy options for net zero Carbon is considered to be broadly compliant with the Future Homes Standard. The precise policy wording should be considered at the Phase 2 stage of the Plan-making process.</p>	06 Apr 2021
Barrie Hesketh	All new properties should have solar energy panels incorporated in the roofs, to reduce energy requirements from the National grid.	16 Feb 2021
Barwood Development Securities & The North West Thornbury Landowner Consortium	<p>Energy Management in New Development:</p> <p>This draft policy will require review in light of the recent publication of the Future Homes Standard – and the Government’s confirmation of the two-stage approach to reach ‘Carbon ready homes’ by 2025.</p> <p>The requirement for Buildings Regulations plus 10% is not supported – with the Government consultation expressly referencing the need for a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The Technical Guidance (p169) appears to indicate that the draft policy is also requiring a 50% reduction of Carbon Dioxide emissions using latest Buildings Regulations SAP. This must be clarified.</p> <p>Whilst we generally support the Council’s ambition to ensure that new developments mitigate and adapt to the impacts of Climate Change, we would have very significant concerns if there were proposals to set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government. Furthermore, no evidence has been published alongside the consultation document which considers the feasibility, deliverability or financial cost of delivering these policy requirements; the only reference is to the now dated JSP evidence base which indicates that the enhanced standards would be viable in the ‘near future.’</p>	12 Apr 2021

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	<p>The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to ‘Climate Change’ advises that:</p> <p>“The National Planning Policy Framework expects Local Planning Authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the Government’s zero Carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability” [Paragraph Reference ID: 6-009-20150327].</p> <p>Unless the Council’s energy efficiency policy aspirations are proven to be feasible, viable and achievable in practice (alongside wider development management policies), it will seriously jeopardise the delivery of other priorities and policies, including the delivery of its housing needs, including affordable homes, and put into question the deliverability of the Local Plan Review as a whole.</p>	
Bloor Homes	<p>Draft Policy - Energy Management in New Development:</p> <p>6.5 A national approach to the setting of energy standards within new homes is coming forward in the Future Homes Standard. The Government has recently published their consultation response to the Future Homes Standard, alongside the Building Regulation changes associated with the first stage of the stepped approach to achieving zero Carbon homes.</p> <p>6.6 The options being considered within this draft policy will therefore require review following this subsequent consultation, and the confirmation that there is a national two-stage approach to reach ‘Carbon ready homes’ by 2025.</p> <p>6.7 The decision to take a staged approach at a national level is in response to the recognition that meeting the Future Homes Standard will require the industry to “develop the necessary supply chains, skills and construction practices to consistently deliver high quality homes that incorporate low-Carbon heat and high levels of energy efficiency” (paragraph 2.20, Future Homes Standard Consultation Response January 2021).</p> <p>6.8 It will therefore be necessary to consider three elements when setting the policy requirements:</p> <p>? The justification/need to set a local standard in light of the move to a standardised national approach when balanced against other objectives;</p> <p>? The deliverability of any enhanced standards in light of the national concerns around the practicalities in the short to medium term, including any impact that an accelerated higher local standard would have on housing delivery; and</p> <p>? The viability of any enhanced standards must be fully tested through the evidence base. This will necessitate the review of the old West of England evidence base which is now dated, and will need to demonstrate that any enhanced policy</p>	01 Apr 2021

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	<p>standard is deliverable at the point of adoption (NPPF paragraph 34 and 57).</p> <p>6.9 The inclusion of a Passivhaus requirement when there is a national Future Homes Standard appears to add an additional unnecessary step to the planning process.</p> <p>6.10 In order that consultees are in a position to comment fully on this policy as it progresses, we strongly recommend that the proposed Technical Guidance is published as part of the next consultation.</p>	
Bristol and England Properties (BEP)	<p>6.6 Again, we support the need for Carbon neutrality to be secured in new housing and for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date.</p> <p>6.7 The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been demonstrated with this policy.</p>	17 May 2021
Caroline Phillips	Severn river / tidal range – harnessing of free predictable energy.	12 Mar 2021
Cate Davidson - Sodbury Town Council	Carbon offsetting, whilst defined as a last resort, is also potentially an easy way out for developers. How £95/tonne has been determined and how existing homeowners can access the fund to reduce their carbon emissions needs some explanation.	03 Mar 2021
Catherine Bird	I don't know enough to comment	28 Feb 2021
Catherine Graham	too general. no real commitment. too much emphasis on consideration and mitigation...easy to wriggle	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Charlcombe Estates	This policy places considerable constraints on new development that have not been considered.	04 Mar 2021
Chris Rich - Mizmo Communications Ltd	No comment.	11 Mar 2021
Christina Biggs - Friends of Suburban Bristol Railways	<p>There should be more consideration of the impact of shopping areas on road traffic - Cribbs Causeway should be served by a shuttle bus to Pilning and Patchway stations and a light rail link to the Henbury Line.</p> <p>The dominance of the car must end or there will be no end to road congestion. Building more roads will only increase the number of cars on the road. People must</p>	27 Feb 2021

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	<p>be actively dissuaded from using a car at the outset and public transport must be in place before any houses are built and bad habits started.</p>	
Clara Goss - Redrow Homes Ltd	<p>Any emerging policy on this matter should dovetail with emerging WECA SDS policy on Climate Change and be subject to whole Plan viability appraisal.</p> <p>The policy should relate to land use planning matters and not include interior domestic fittings or appliances in residential development as proposed by SGLP2020 Option 2. There is no certainty that those purchasing homes would retain such cooking or other energy consuming devices should they be approved under SGLP2020 Option 2 – it is considered therefore that such a policy option would not be enforceable for decisionmakers and in practice would not allow for consumer choice.</p> <p>It is noted that SGLP2020 Option 2 as currently proposed is a 'viability off' position.</p> <p>On 19th January 2021 the Government published the response to its Future Homes Standard consultation which closed in February 2020. The outcome of the consultation was that their Option 2 is the Government's preferred option which will rely on the installation of low Carbon heating system within new dwellings to remove the use of Fossil Fuel heating systems and will also require dwellings to make gains by use of fabric efficiency improvements and other contributing technologies such as PV (photovoltaic panels).</p> <p>Option 2 - 31% reduction in whole house emissions, involving the fabric and use of technologies in order to uplift the Fabric Energy Efficiency Standard (FEES).</p> <p>The consultation response also confirmed that Local Authorities will retain autonomous ability to set their own energy efficiency standards within their jurisdiction. To be adopted as planning policy such standards will need to be tested through Local Plan Examinations and therefore will need to be based on locally specific evidence and subject to full Plan viability appraisal.</p> <p>The Fabric Energy Efficiency Standard (FEES), has been retained as a universal method of measuring the performance of new dwellings. It is understood that a 'fabric first' approach will be "at the heart of all new homes alongside a low Carbon heating system."</p> <p>On 19th January 2021 the Government published a further consultation on the overheating of buildings which will run until 13th April 2021.</p> <p>It is anticipated that updates to Part L/F of the Building Regulations concerning these matters will be implemented towards the end of Q3 and beginning of Q4 2021 to allow for the conclusions of the overheating consultation (end of Q2) to inform the overall update. Such updates should be used to inform the proposed Regulation 19 SGLP2020.</p>	26 Apr 2021
Clifton Homes (SW) Ltd	<p>We do not seek to comment on these at this stage.</p>	24 Mar 2021

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Colin Gardner - TRAPP'D	No comment.	15 Mar 2021
Crest Nicholson South West Ltd - Land at Harry Stoke/East of Harry Stoke (South)	<p>Energy Management in New Development:</p> <p>This draft policy will require review in light of the recent publication of the Future Homes Standard – and the Government’s confirmation of the two-stage approach to reach ‘Carbon ready homes’ by 2025.</p> <p>The requirement for Buildings Regulations plus 10% is not supported – with the Government consultation expressly referencing the need for a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The Technical Guidance (p169) appears to indicate that the draft policy is also requiring a 50% reduction of Carbon Dioxide emissions using latest Buildings Regulations SAP. This must be clarified.</p> <p>Whilst we generally support the Council’s ambition to ensure that new developments mitigate and adapt to the impacts of Climate Change, we would have very significant concerns if there were proposals to set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government. Furthermore, no evidence has been published alongside the consultation document which considers the feasibility, deliverability or financial cost of delivering these policy requirements; the only reference is to the now dated JSP evidence base which indicates that the enhanced standards would be viable in the ‘near future.’</p> <p>The NPPF paragraphs 16b), 34 and 57 all relate to the need for Local Plans to be deliverable (at the point of adoption) and have regard to viability and the PPG section in relation to ‘Climate Change’ advises that:</p> <p>“The National Planning Policy Framework expects Local Planning Authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the Government’s zero Carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability” [Paragraph Reference ID: 6-009-20150327].</p> <p>Unless the Council’s energy efficiency policy aspirations are proven to be feasible, viable and achievable in practice (alongside wider development management policies), it will seriously jeopardise the delivery of other priorities and policies, including the delivery of its housing needs, including affordable homes, and put into question the deliverability of the Local Plan Review as a whole.</p>	12 Apr 2021
Dan Erben - Thornbury Market Garden	More support for sustainable energy and energy use reduction. Large reduction of use could be achieved through supporting lifestyles and choices linked to lower consumption and energy saving measures. More support could be given to local sustainable energy generation - community/municipal biomass reactors and roof-mounted solar panels are one example of what could be supported and expanded.	23 Feb 2021
Daphne	There is far too little insistence that any new development enforce minimum energy	08 Apr

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Dunning - Pucklechurch Parish Council	efficiency standards in private bought and rented sectors or any requirement of higher standards than current national standards for new build – ideally all new homes and commercial properties should be zero carbon or even better built to Passivhaus standard and even though local authorities are unable to mandate this standard it is possible to insist on certain aspects of it (energy usage, insulation, build quality etc). Further, thanks to the Green Building Council and Core Cities, the government has clarified that “local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.” The council fail to exploit this. Any new development should require developers to the highest standards in energy conservation, renewables, insulation, energy management systems and fitting eco-heating and developing heat networks where appropriate.	2021
David George	Exceed Building Regulation standards. Impose planning conditions that Developers cannot wriggle out of. Building in features is cheaper than retro fitting	15 Feb 2021
David Hathaway	No comment	27 Feb 2021
David Heape	Severn river / tidal range – harnessing of free predictable energy.	12 Mar 2021
David Redgewell - South West Transport Network and Railfuture Severnside	Welcome the policy but need better policy of sustainability of the Transport network.	28 Feb 2021
Diverse Partnerships (In Collaboration With Edward Ware Homes)	Please see submitted Local Plan 2020 Phase 1 Issues and Approaches Consultation Response Document.	05 May 2021
Donna Simmons - Emersons Green Town Council	No	01 Mar 2021
Edward Ware Homes	Energy Management in New Development: 6.6 Again, EWH are committed to delivering Carbon neutral homes and buildings on their sites and wholeheartedly support the need for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date. 6.7 We note the two options presented and would support Option 2 in principle. The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been	05 May 2021

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	<p>demonstrated with this policy.</p> <p>6.8 We would, naturally, expect to see this policy evolve alongside any legislation at the national level.</p>	
<p>Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...</p>	<p>We agree with the sentiment of the policy but would question whether a Local Plan is the appropriate place to implement such changes. The standardisation of low Carbon development through Building Regulations and the likely changes as a result of Government's commitment to the green agenda would, in our view be the most appropriate, consistent and enforceable route to decarbonising future development.</p> <p>Bringing in such stringent targets in a single area potentially in advance of other Authorities doing the same may hinder regeneration and development projects in the short to medium term. However, once a consistent approach is rolled out through Building Regulations the industry is required to catch up on a national basis and it is then that such measures become increasingly cost effective.</p>	<p>05 May 2021</p>
<p>Emma Jarvis</p>	<p>I strongly disagree with writing 'Certified Passivhaus' into a policy document. I agree with reducing energy consumption and emissions in general but picking and promoting one strict methodology is not helpful.</p> <p>I have been on a Passivhaus course and was surprised at how restrictive it was in a number of commercial ways. Construction product manufacturers have to regularly pay to be certified by Passivhaus so you find that the specifier / designer is very restricted by the product choices in the market to achieve the standard. You find that mostly the larger worldwide product manufacturers can afford the time and money to pursue Passivhaus accreditation and this is to the detriment of smaller perhaps more local and regional South Gloucestershire based businesses and their skills. The only compliant products within their strict selection system for certain items might need to be imported from e.g. Germany/Belgium where the standard is more established. This has implications in terms of material cost, travel miles and also an effect on what a building might look like if product choice is so limited. This has appearance ramifications for areas where a particular aesthetic is required to blend in with a particular regional vernacular of buildings.</p> <p>There is also debate on the merits of orientation of the building and it's openings and the window sizes vs. compliance vs fitting into a regional vernacular style that your urban designers / conservation department need to be aware of.</p> <p>User criticism of Passivhaus is that it is a rigid system that is slow to change and adopt feedback.</p> <p>Universities which teach building design are currently also looking and advocating other approaches and methods and you may wish to also research the LETI standards approach before adopting this policy.</p>	<p>28 Feb 2021</p>
<p>Fiona Milden - Vistry Homes Limited</p>	<p>Whilst we broadly support the aspirations of the policy to deliver net zero Carbon development, the imposition of policy requirements which exceed Building Regulation standards is likely to stifle the delivery of new development, imposing</p>	<p>09 Mar 2021</p>

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	<p>constraints and affecting site viability.</p> <p>The delivery of net zero Carbon development should be brought forward as a nationally consistent, Government-led policy objective. The Government's Future Homes Standard is due to be effective from 2025 and will require new build homes to be future-proofed with low Carbon heating and world-leading levels of energy efficiency.</p> <p>Vistry Homes urges South Gloucestershire Council to align the Energy Management policy with the standards and timescales of the Government's Future Homes Standards. Nonetheless, in the interests of promoting an ambitious Plan, its supporting text and guidance can strongly encourage developments to introduce Carbon reduction measures in advance of Building Regulations and to achieve passivhaus certification, wherever possible.</p>	
Fi Riches	All new builds and major redevelopments (possible exception for conservation areas) should have solar panels, rainwater toilet flushes, etc and other sensible "green" features and the highest speed broadband	09 Dec 2020
Gareth Fielding	We need green energy AND traditional. See Texas.	28 Feb 2021
Hannick Homes	This policy could place considerable constraint on the viability of new development that must be properly assessed.	25 Mar 2021
Haydn Gill	Regulated and Unregulated emissions should be used.	06 Jan 2021
Helen Johnstone - Stroud District Council	<p>SDC note that further detail regarding sustainable design and construction measures will be provided in a new policy which it is suggested could include the following issues:</p> <ul style="list-style-type: none"> • minimising waste and maximising recycling of any waste generated during construction and in operation, including provision of internal recycling bins • conserving water resources and minimising vulnerability to flooding • ensuring adaptability to facilitate future refurbishment and retrofitting • provision of cycle parking • enabling electric vehicle charging • requirement for the completion of a sustainable construction checklist 	26 Feb 2021
Ian Tibbert	We need to push far harder on green energy New developments domestic and commercial should all have done forum of solar power which is planning requirement	27 Nov 2020
IM Land	<p>77. As a general principle, IM Land supports the need to deliver net Carbon zero development in a managed way that is viable, but it must be consistent with the Future Homes Standard being rolled out in 2021/2022 and fully applied by 2025.</p> <p>78. The approach to achieving net zero Carbon will often be different on each site, depending upon its location, landform, and other factors such as the need to respond to the character of a particular area. Whichever route is followed by SGC, it should not over prescribe the method of reaching net zero Carbon and should not compete with changes to statutory Building Regulations which in due course will</p>	11 May 2021

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	<p>also prescribe necessary standards and approaches.</p> <p>79. Off-setting should not just be related to a fixed payment per tonne of CO2 but should equally be able to form part of a wider on or off-site mitigation scheme and the policy should reflect this.</p> <p>80. If the Council were to consider pursuing Option 2, the application of item 2(b) in respect of residential development is too prescriptive.</p> <p>81. Whether Option 1, Option 2 or another option is pursued, it will need to form part of the whole Plan viability testing exercise to demonstrate that it is deliverable alongside other obligations. Indeed, SGC many need to focus on infrastructure efficient schemes to support the proposed approach and reduce environmental and financial costs which can be recycled into energy management.</p> <p>82. Given the very specific nature of the proposals for addressing Energy Management it is suggested that SGC engages with the development industry to collectively explore ways in which the policy can be delivered. This would lend support to the process and reduce viability risks being raised later in the Plan's preparation. IM Land would welcome an opportunity to discuss energy management and how it can be delivered with SGC. IM Land's only concern at this stage is the ability of complex Brownfield sites which underpin the Urban Lifestyles approach, to viability delivery the energy management expectations. SGC will need to present evidence to show that a range of Brownfield sites can achieve this.</p>	
Ivywell Capital (IC)	<p>6.6 Again, we support the need for Carbon neutrality to be secured in new housing and for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date.</p> <p>6.7 The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been demonstrated with this policy.</p>	17 May 2021
James Carpenter - Falfield Parish Council	<p>Question 21:</p> <p>For the future, to help reduce the future Carbon foot print we feel that all building companies that build new houses should be made to supply solar panels on every new house they build, this will not only help the house owners, but it will also help the energy companies & the environment.</p> <p>Question 22:</p> <p>No.</p>	14 Apr 2021
John Acton	<p>No. It surprises me that houses now under construction do not have integrated solar panels. I expected that by now a roofing system incorporating solar panels would have been designed and would be little more costly than traditional roofing. It</p>	26 Mar 2021

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	would also be more effective and aesthetic, as it would cover the whole roof surface whereas added panels are usually just obvious patches on part of the roof.	
John Brimacombe	All new housing should have built in green energy recovery, eg solar panels, electric vehicle charging points/reverse charging eg using vehicle as green energy store.	28 Feb 2021
John Mills - Cotswolds Conservation Board	<p>In principle, the Cotswolds Conservation Board supports the policy aspiration to increase energy efficiency and deliver net zero carbon in new development.</p> <p>It is important that the policy addresses ‘unregulated energy use’ (i.e. Policy Option 2) as this can account for 50% of total energy use.</p> <p>We support the sequential approach advocated in the draft policy, in which the first consideration is the extent to which the demand for heating, cooling, etc., can be minimised.</p> <p>The policy indicates that development should be Certified Passivhaus (or equivalent) or meet the subsequent criteria. However, these subsequent criteria do not set thresholds to show what would constitute an appropriate or acceptable contribution to the criteria specified in the policy</p> <p>It would be useful if the policy could also be applied to the retrofitting of existing development as well to new development.</p> <p>Within the Cotswolds National Landscape and its setting, care will need to be taken to ensure that energy management measures are compatible with the purpose of AONB designation and with the locally distinctive and historic character of settlements within the AONB. In 2014, the Board published guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds National Landscape.</p> <p>We recommend that South Gloucestershire Council should have regard to this publication when developing its ‘Energy Management’ policy.</p>	16 Mar 2021
Kate Kelliher	Heat as a service is a good idea. But there will still be people who can’t afford to stay warm.	31 Jan 2021
Katherine Adair - UK Green Building Council	<p>UKGBC recommend policy option 2 to be taken forward – e.g. requiring net zero carbon from regulated and unregulated energy use.</p> <p>We recommend setting specific targets for residential, as per the following:</p> <p>An energy use intensity (EUI) target of <70 kWh/m2/year operational energy use in GIA excluding renewable energy contribution shall be met, with this target strengthening to <35 kWh/m2/year by 2030.</p> <p>This target includes both regulated and unregulated energy consumption.</p> <p>New build homes shall deliver ultra-high levels of energy efficiency consistent with a</p>	17 Mar 2021

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	<p>space heat demand of 15-20kWh/m² /year.</p> <p>Designers shall evaluate the operational energy use using realistic information on the intended use, occupancy, and operation of the building to minimise any performance gap. They shall demonstrate this through compliance with the above targets using a design for performance methodology such as Passivhaus PHPP or CIBSE TM54 Operational Energy</p> <p>Residual heat demand should be met through renewable heat sources or fossil-fuel, combustion free energy networks where this is feasible. Where it can be demonstrated that there is no other viable alternative, the rationale must be clearly provided with supporting information as to how the design had considered low-carbon heating sources.</p> <p>All developments shall assess the viability for onsite renewable generation. For developments with SE/SW facing roof(s), a minimum 40% solar technologies installation as a percentage of building footprint area shall be met unless it can be clearly demonstrated that this is not practically viable, e.g. on a heavily over shaded site or where there are conflicting spatial limitations due to the use of heat pumps.</p> <p>In addition to the above, we would also recommend including policy requirements for measuring in use performance for residential buildings:</p> <p>Demonstration that the principles of Soft Landings will be followed and a recognised performance gap / assured performance tool will be used to minimise the potential performance gap between design aspiration and the completed development. The effectiveness of measures will be reviewed and ratified as part of the post-completion discharge of conditions.</p> <p>AND</p> <p>All major developments shall implement a soft landings approach from ‘Phase 1: Inception and Briefing’ as per BSRIA BG 54/2018 Soft Landings Framework 2018, to ensure any building requirements set at the beginning are maintained throughout the project from inception to completion and beyond.</p> <p>AND</p> <p>All developments shall put in place a recognised monitoring regime to allow the assessment of energy use, indoor air quality and overheating risk for 20% of the dwellings and at least 90% of the common parts for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable owners and the planning authority.</p>	

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	<p>In addition, for any offsetting purposes, these emissions should be calculated using a design for performance methodology such as Passivhaus PHPP or CIBSE TM54 Operational Energy.</p> <p>As a stretch, in addition to the above Major developments should be required to make a financial contribution to the LPA's carbon tax fund equal to the residual upfront embodied carbon (equating to the emissions covered by Modules A1-A5 of the RICS methodology) of the development at a rate of £X/tCO2 at the point of completion.</p> <p>For clarity, the upfront embodied carbon should be calculated using a nationally recognised Whole Life Carbon Assessment methodology and this requirement should be included only if associated policy requiring a WLC should be undertaken is included.</p> <p>For non-domestic buildings, we recommend policies following the same approach as residential. We are currently formalising our position relating to the targets that we recommend for non-residential developments, and this will be available over the coming months. Once we have confirmed this UKGBC would be happy to have a further discussion around the recommended targets.</p>	
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Lauren Cook - Stride Treglown	The university offers its support to the use of the Certified Passivhaus (or equivalent) standard as a means by which net zero carbon development is achieved. The university's new student accommodation development (which is to be delivered in two phases) has been designed to Passivhaus standard in recognition of the university's commitment to being carbon neutral as an organisation, with net-zero emissions of greenhouse gases by 2030 and is sector-leading in a European context.	01 Mar 2021
Lee Taylor	Couldn't see much detail but see previous comments	23 Jan 2021
Mactaggart & Mickel - Frampton Cotterell	This policy places considerable constraints on new development that have not been considered.	07 Apr 2021
Martyn Hall	More help with replacing windows , getting solar panels and wind generators	26 Feb 2021
Matthew Blaken - DJ&P Newland Rennie Ltd	<p>Is 100% achievable or will this prevent much needed housing provision?. Would a lower phased target be more appropriate.</p> <p>Consider a list of exceptions for low energy using eg. agricultural, storage buildings.</p>	14 Dec 2020

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Matthew McCollom	The principles are sound. The manner of implementation is the key.	28 Feb 2021
Maurice Wayne	No	08 Feb 2021
Melinda Evans	- Insulation that is validated to high standard (to remedy failures of new builds with poorly installed dot and dab insulation) - Solar PV to be mandated on ALL new builds	01 Mar 2021
Michael Sharpe-Neal	But not at the cost of removing already in existence efficient and environmentally friendly processes.	28 Feb 2021
Michelle Greaves	Doesn't go far enough - new homes should be carbon neutral	03 Feb 2021
Mike Burgess	I agree with the policies but simply talking up the benefits of Walking/ Cycling and Public Transport will not change behaviours . What works in well-resourced (social & health, economic as in retail , leisure & employment, and transport) Urban and City environments does not work in rural areas.	21 Feb 2021
Miller	Solar panels should be encouraged on All new developments.	01 Dec 2020
Mr. Blake - Oldland Parish Council	Comments as above	17 Feb 2021
Newland Homes - Land at Aust Road	6.7 Again, we support the need for Carbon neutrality to be secured in new housing and for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date. 6.8 The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been demonstrated with this policy.	14 May 2021
Newland Homes - Land West of The B4061 Bristol Road	6.6 Again, we support the need for Carbon neutrality to be secured in new housing and for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date. 6.7 The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been demonstrated with this policy. 6.8 My client has committed on existing ongoing development sites in South Glos to Carbon zero (energy) and are very much committed to addressing Climate Change on this site at Thornbury.	13 May 2021

Respondent Name	User Response: Text	Response Created
Nick Woodward	The contribution of the building process itself to climate change, i.e. transportaion of materials to site, light and noise pollution during construction, site work force, materials used, emissions from on-site vehicles and equipment.	28 Feb 2021
Nicola O'Connell	No comment	27 Feb 2021
North Thornbury Landowners Consortium	Generally support the Council's ambitions, but the Council should not go further or go earlier than the proposed Future Homes Standard or purport to enhance Building Regulations beyond current sustainable construction methods. This policy requires significant work to provide an evidence base before further consultation.	29 Apr 2021
Patrick Williams	All new builds need to have solar panels or heat pump solution built in.	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Not aware of any.	26 Feb 2021
Pauline and Richard Wilson	See above section. Question 20. We agree with policy option no. 2 to cover both regulated and unregulated energy use. We also think the carbon offsetting policy of retrofitting existing housing stock is an excellent idea.	25 Feb 2021
Persimmon Homes Severn Valley	Please see attached document. New Policy: Energy Management in New Development: 6.6 We support the principle of this policy, however, it is important that proposals are considered on their individual merits including taking into account factors such as the availability of technology and viability. We note that the supporting text describes Option 1, that is to say, requiring a 100% reduction in Carbon emissions from regulated energy use has been tested through the Local Plan viability study, however, the link to that document has been omitted. 6.7 We also note that Option 2, that is to say requiring a 100% reduction in Carbon emissions from regulated and unregulated energy use has not been tested through the Local Plan viability study. It is also difficult to understand how the approach to unregulated energy use could be enforced in the longer term and once the developer had moved off the site. 6.8 As observed above, the link to the Local Plan viability study appears to be missing from the consultation document. We note that the Local Plan Evidence webpage includes a document entitled "Cost of Carbon reduction in new buildings" but it is not clear whether this is the document being referred to. Notwithstanding that, it is dated December 2018 and is therefore considered dated. 6.9 It is also of relevance that the Future Homes Standard (FHS) was consulted on by Central Government in early 2020 with the Government's response to those comments received being published on 19th January 2021.	11 May 2021

Respondent Name	User Response: Text	Response Created
	6.10 As this (the FHS consultation) represents the first stage of a two-part consultation on proposed changes to Part L (Conservation of fuel and power) of the Building Regulations, we would suggest that the outcome of the entire process should be considered in formulating future policy.	
Peter Box	No comment.	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	Gleeson supports the construction of more energy efficient homes but any new standards should not conflict with or go beyond the relevant Building Regulation standards. Any standards for new development must also be viability tested to ensure that they would not prevent new development coming forward.	10 Mar 2021
Progress Land Ltd	No.	11 May 2021
Rebecca Woodward	The contribution to climate change by the building process. E.g transport of building material to sites, light and noise pollution during construction, accessibility to site by work force, materials used, emissions from on site vehicles etc	28 Feb 2021
Redcliffe Homes	This policy places considerable constraints on new development that have not been considered.	04 Mar 2021
Redcliffe Homes	No comments.	01 Jun 2021
Redrow Homes (SW)	Please see enclosed representations.	29 Apr 2021
Richard Bentham	Please promote motorcycles as a mode of efficient, low pollution, less congested commuting. Your plan mentions them twice. Not good enough! Provide secure parking & promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle.	26 Jan 2021
Richard Lloyd	These are very ambitious proposals and are to be commended. I have no additional issues to suggest for inclusion in the policy.	03 Mar 2021
Robert Harris - Olveston Parish Council	No	26 Feb 2021
Robin Perry	New development energy schemes should be worked and implemented as a requirement for any new development. Existing standard 80A house electrical services will not be adequate for homes owing two EV. It is not unusual for a home to have two cars so it's reasonable to assume from 2030 many home may have two EVs. The standard 80A service will not support two 7Kw home chargers and domestic demand. Developments should be planned with centralised renewable resources including energy storage.	21 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb

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		2021
Rosalyn Pyle	I don't know	28 Feb 2021
Sean and Jacqueline Rinaldi	No Comment.	26 Mar 2021
Shelley O'Callaghan	The street lighting, a one for all approach is not necessarily fitting for all locations . Although I understand and partially agree with the use of led lighting	04 Dec 2020
Simon Fitton - YTL Developments (UK) Ltd	<p>It is difficult to state a preference for option 1 or 2 as the supporting text makes clear what the issue is; that both options need to be subject to robust viability testing through the preparation of the Local Plan. Many aspects of the policy do need to be thoroughly tested; for example there is recognition that reducing CO2 emissions from regulated energy use in apartment blocks is more difficult to achieve but even 35% is difficult in higher storey developments. These matters require careful exploration before rigid standards are enforced.</p> <p>It already stands as a long, complex and unwieldy policy that is difficult to follow. Every effort should be made to make it as concise as possible; flexibility needs to be woven into the policy for both Applicants and the LPA alike; this Issues Paper does not identify what Plan Period this Local Plan will be working to but is assumed to be at least 15 years from point of adoption. National policy, Building Regulations, other legislation and technology and innovation are going to change hugely over that period. The priority for the Local Plan must be to allow for change without setting undeliverable targets today that might be perfectly achievable in years to come.</p> <p>On larger scale developments it is often the case that conditions require energy statements to be submitted on a phase by phase basis that should adhere to the prevailing policy of the time. The policy should therefore be drafted such that is flexible without having to be revisited through a lengthy Local Plan review process; perhaps the policy should simply refer to guidance set out in the Technical Paper which can be reviewed more readily?</p>	16 Mar 2021
Simon Moore	<p>Places should include:</p> <ol style="list-style-type: none"> 1. All development in the county to include heat pumps, solar panels, electric car changing points, full insulation - without exception 2. Target date to remove all gas boilers. 3. Provision of electric car fast-changing points at all council owned car parks. 	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	No.	06 May 2021
Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire	<p>Early implementation.</p> <p>Achieving retro-fitting.</p> <p>Increasing the offset charge.</p>	02 Mar 2021

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District]		
South West Housing Association Planning Consortium (HAPC)	<p>We support the Council's commitment to be Carbon neutral by 2030. As Housing Associations we recognise the need to future proof homes particularly with Future Homes Standard due to be adopted by 2025. Our members are already building energy efficient homes in advance of the Future Home Standard adoption. Moreover, promoting sustainable development is the core objective of the planning system and it is important all new developments continue to support this aim.</p> <p>There are a number of working draft policies at Appendix 2 which concern Climate Change mitigation, energy management and electric car charging. We support these draft policies where the Council can show that they have been robustly viability tested. While these policies are essential for futureproofing our communities, they should not restrict the delivery of much needed affordable housing in South Gloucestershire, especially as affordability remains a key issue for the Council.</p>	14 May 2021
South West Strategic Developments (SWSD)	Please see enclosed representations.	31 Mar 2021
St. Modwen Developments and The Tortworth Estate	<p>We understand that the Council is proposing to run with Option 1 and then depending on evidence, costs and comments during Plan preparation move to implement Option 2 for residential development. However we note one option is presented for non-residential development which relies on regulated energy use.</p> <p>Overall, the ambitious approach of this policy is supported and there does need to be a step change to meet ambitious sustainability targets. However, new development needs to be deliverable, and so it is necessary to consider the viability implications of such stringent requirements, and not in isolation to the implications of wider Plan objectives including, for example, design objectives, Affordable Housing and land take for green infrastructure. We would also like to highlight that any policy requirements should align with the Government's proposed Future Homes Standard.</p>	05 Mar 2021
Stephen Hickmans	Improving all amenities before any development begins.	26 Jan 2021
Steve Seward	Along with water and waste disposal, the provision of energy is likely to be far cheaper to urban expansion developments than to other development options, which is why this strategy is likely to favour sprawling highly populated developments as opposed to creating more new small rural village environments.	13 Feb 2021
Strongvox Homes	<p>Energy Management in New Development:</p> <p>6.6 Again, Strongvox Homes are committed to delivering Carbon neutral homes and buildings on their sites and wholeheartedly support the need for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date.</p>	11 May 2021
Sue Green - Home Builders Federation	The Council's proposed policy approach should not conflict or go beyond the Government's proposals for Building Regulations. As set out in The Future Homes Standard consultation (ended on 7th February 2020), the Government intends to	05 Mar 2021

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	<p>future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.</p> <p>Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. Energy performance data has shown that around 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to just 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.</p> <p>The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes.</p> <p>The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation road map, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) and Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. The second Part L consultation is published alongside the Government's Response. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025.</p> <p>The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. Homes built under the Future Homes Standard will be future-proofed with low carbon heating and world-leading levels of energy efficiency. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p> <p>The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, which means that the Council will retain powers to set local energy efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but</p>	

Respondent Name	User Response: Text	Response Created
	<p>consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. As set out in the Planning for the Future White Paper a simpler planning process improves certainty. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal.</p> <p>Furthermore, the Council's policy approach should not compromise the viability of development (see HBF answer to Q18 above). The Council's updated viability assessment should include additional costs for 2021 Part L uplift and Future Homes Standard 2025. The Government's estimated cost for Option 2 (interim step of 31% reduction in carbon emissions compared to the current Part L 2013 requirements) is £4,847 per dwelling as yet the full costs for Future Homes Standard 2025 are unknown.</p>	
Susan Smith	Use as much renewable energy as possible.	16 Feb 2021
Swanmoor Stoke Ltd	SSL are supportive of strategies which promote zero Carbon and energy positive development.	06 Apr 2021
Terry Chamberlain and Alan Jobbins	<p>Energy Management in New Development:</p> <p>6.6 Again, we support the need for Carbon neutrality to be secured in new housing and for this to be achieved from the outset, rather than through opportunities for retrofitting at a later date.</p> <p>6.7 The only matter that is worth noting is that unregulated energy is difficult to predict given that it is heavily influenced by user behaviour. In the interests of clarity, we would welcome a fixed per dwelling target being set out within the policy which has been subject to a robust viability assessment. This will make it clear at the Development Management stage where compliance or non-compliance has been demonstrated with this policy.</p>	05 May 2021
Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group	In particular, we strongly support moving to option 2.	12 Mar 2021
The Tortworth Estate	<p>We understand that the Council is proposing to run with Option 1 and then depending on evidence, costs and comments during Plan preparation move to implement Option 2 for residential development. However we note one option is presented for non-residential development which relies on regulated energy use.</p> <p>Overall, the ambitious approach of this policy is supported and there does need to</p>	05 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>be a step change to meet ambitious sustainability targets. However, new development needs to be deliverable, and so it is necessary to consider the viability implications of such stringent requirements, and not in isolation to the implications of wider Plan objectives including, for example, design objectives, Affordable Housing and land take for green infrastructure. We would also like to highlight that any policy requirements should align with the Government's proposed Future Homes Standard.</p>	
Tom Cotton - Road Haulage Association	See our response at 3.	01 Mar 2021
Tony Kerr	<p>Consideration should be given to shared benefit from "common" PV or GSHP installations within a new estate, rather than individual house installations. EV charging spaces should be capable of being provided at a higher rate, electricity supply.</p>	17 Feb 2021
Trystan Mabbitt - Hanson UK - Heidelberg Cement Group	The scale and deliverability of new development is a critical consideration in ensuring that effective energy management policies and aspirations can be met.	18 Mar 2021
Victoria Bailey - Oldbury on Severn Parish Council	It is difficult to understand how policy on unregulated energy (Option 2) can be viable but at Phase 2 it may become clearer.	24 Mar 2021
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Energy Management in New Development:</p> <p>The Government's Future Homes Standard will set the benchmark for environmental standards for all new housing, including a commitment to removing traditional Fossil Fuel heating systems, from 2025. The Government published its response to the Future Homes Standard (FHS) 2019 consultation in January 2021. As set out within the response, from 2025 the FHS will deliver homes that are 'Zero Carbon ready.' The Government intends to implement the FHS in 2025: a full technical specification for the FHS has been accelerated and will be consulted on in 2023, followed by the introduction of the necessary legislation in 2024.</p> <p>Ahead of the implementation of the FHS in 2025, the Government is introducing an interim uplift to Part L of the Building Regulations, which will include provisions for low Carbon heating systems and heat pumps as primary heating technology in new homes. The interim uplift is proposed to take place in 2021 and will encourage homes that are future proofed for the longer term. These homes will be expected to produce 31% less CO2 emissions compared to current standards.</p> <p>The Government's FHS response (January 2021) states that the Planning and Energy Act 2008 will not be amended in the short-term – the new planning reforms will instead clarify the longer-term role of Local Planning Authorities in determining local energy efficiency standards. The NPPF (Paragraph 150) does however make clear that any local requirements for the sustainability of buildings</p>	06 May 2021

Respondent Name	User Response: Text	Response Created
	<p>should reflect the Government’s policy for national technical standards. The PPG clarifies that, when setting any local requirement for a building’s sustainability, LPAs should do so in a way consistent with the Government’s zero Carbon buildings policy and adopted nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence, paying careful attention to viability.</p> <p>The FHS is the direction of travel for nationally set technical standards. The Government recognises that the FHS will be challenging to deliver in practice and it is for this reason that interim measures are proposed to ensure that all parts of industry are ready to meet the Future Homes Standard from 2025. The Government’s response states:</p> <p>“As well as delivering high Carbon savings without relying on additional Carbon offsetting measures, the Option 2 specification achieves a balance between making progress towards the Future Homes Standard while providing industry with the time it needs to develop the supply chains and skills that will be necessary to deliver the Future Homes Standard and accounting for market factors.”</p> <p>“The 2021 uplift will ensure the delivery of high-quality homes that are in line with our broader housing commitments and encourage homes that are future-proofed for the longer-term. We need as many homes as possible to be built with low Carbon heating going forwards and the feedback we received from developers based on our consultation proposals indicated that many will start to do so under Option 2, therefore increasing the capacity of supply chains and readying installer skills for the introduction of the Future Homes Standard.”</p> <p>The Government is therefore clear that the FHS transitional arrangements are needed to support the successful delivery of the FHS in 2025, enabling the market and supply chain to adapt, and taking into consideration market factors.</p> <p>The draft wording under the Policy seeks to achieve either Net zero Carbon (100% reduction in Carbon emissions) from regulated energy use (Option 1); or Net zero Carbon (100% reduction in Carbon emissions) from regulated and unregulated energy use (Option 2). The suggested policy wording seeks to minimise end user energy requirements over and above those required by Building Regulations (at the time of full planning or Reserved Matters approval) through energy efficiency measures by at least 10% or achieve any higher standard that is required under national planning policy – this is not consistent with the approach advocated by the NPPF or the intention of Government through the implementation of the FHS. The policy should be re-worded so that expectations are consistent with the nationally set standards.</p> <p>The draft policy seeks to introduce a requirement for the use of renewable energy on residential sites and to achieve an overall on-site reduction of Carbon Dioxide emissions from regulated energy use of at least 50%, unless the development includes flats where a 35% reduction is acceptable (for that part of the site only). Not all sites are suitable for renewable energy generation and it should be</p>	

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	<p>recognised that additional measures introduced over and above nationally set targets will have a direct bearing on scheme viability and deliverability. The PPG is clear that a viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the Plan. It is the responsibility of Plan makers in collaboration with the local community, developers, and other stakeholders, to create realistic, deliverable policies. Drafting of Plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.</p> <p>With reference to the proposed ‘off-setting’ contribution, it is not clear how contributions would be spent to achieve net zero in operation. If off-site solutions are proposed by the Council as a solution, against which contributions would be sought, details should be clearly detailed and consulted upon in advance.</p> <p>It should also be recognised that the Government’s FHS response (January 2021) makes clear that the new planning reforms will clarify the longer-term role of Local Planning Authorities in determining local energy efficiency standards. Planning reforms emerging from the Government’s ‘Planning for the Future’ White Paper (2020) are expected to be implemented before the end of this Parliament. The reasonable expectation, therefore, is that the policy provisions being consulted upon as part of the SGLP will remain up to date for a period of no more than one year (assuming the SGLP is adopted in 2023).</p>	
Waddeton Park Ltd - Land at Hicks Common Road	<p>74. As a general principle, Waddeton Park Ltd supports the need to deliver net Carbon zero development in a managed way that is viable, but it must be consistent with the Future Homes Standard being rolled out in 2021/2022 and fully applied by 2025.</p> <p>75. The approach to achieving net zero Carbon will often be different on each site, depending upon its location, landform, and other factors such as the need to respond to the character of a particular area. Whichever route is followed by SGC, it should not over prescribe the method of reaching net zero Carbon and should not compete with changes to statutory Building Regulations which in due course will also prescribe necessary standards and approaches.</p> <p>76. Off-setting should not just be related to a fixed payment per tonne of CO2 but should equally be able to form part of a wider on or off-site mitigation scheme and the policy should reflect this.</p> <p>77. If the Council were to consider pursuing Option 2, the application of item 2(b) in respect of residential development is too prescriptive.</p> <p>78. Whether Option 1, Option 2 or another option is pursued, it will need to form part of the whole Plan viability testing exercise to demonstrate that it is deliverable alongside other obligations. Indeed, SGC may need to focus on infrastructure efficient schemes to support the proposed approach and reduce environmental and financial costs which can be recycled into energy management.</p> <p>79. Given the very specific nature of the proposals for addressing Energy</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>Management it is suggested that SGC engages with the development industry to collectively explore ways in which the policy can be delivered. This would lend support to the process and reduce viability risks being raised later in the Plan's preparation. We would welcome an opportunity to discuss energy management and how it can be delivered with SGC. The only concern at this stage is the ability of complex Brownfield sites which underpin the Urban Lifestyles approach, to viably delivery the energy management expectations. SGC will need to present evidence to show that a range of Brownfield sites can achieve this.</p>	
William Howell	No	23 Feb 2021

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