

Sustainable Buildings SPD

Appendix 2 - Public Participation Report

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
1: Introduction				
<i>1: Introduction</i>				
BLAST (Bringing Leamington Allotment Societies Together) (Geoff Southgate) [499]		BLAST represents 350 allotment members in North Leamington. Future plans should make provision for local people to grow and enjoy healthy food by protecting existing allotments and the provision of more allotments. These spaces are a facility for people to socialise, exercise and grow food as well as a home to a broad biodiversity.	These comments are noted but are not relevant to the scope of the Sustainable Buildings SPD.	No Change.
Warwickshire Rural Community Council (Linda Ridgley) [22]	Support	Congratulates the Council on its clear guidance and was pleased to see the regulations apply to extensions as well as new build and to non-residential and residential development. Liked the use of examples and advice on how to achieve energy efficiency.	Comments are noted	No change
Highways Agency (Colin Mercer) [214]		No comments	Noted	No change
E-on (Mr Robert Field) [1082]		No comments	Noted	No change
Mr Derek Turpin [495]		No comments	Noted	No change
Bishops Tachbrook Parish Council (Mrs Simone Bush) [182]		No comments	Noted	No change
Coal Pension Properties Ltd [1088]	Support	Supports sustainable development and construction techniques as an important principle for the district and recognises the significance and wider implications of a commitment to reducing climate change through the planning system	Comments are noted	No change
Warwick Castle [192]	Support	Supports sustainable development and construction techniques as an important principle for the district and recognises the significance and wider implications of a commitment to reducing climate change through the planning system	Comments are noted	No change
Friends of the Earth (Birgitta Ashworth) [51]		In order to encourage cycling new developments should include safe cycle storage areas (for example in overlooked courtyards) to reduce bicycle theft.	The issue of safe cycle parking is dealt with elsewhere in the Vehicle Parking Standards Supplementary Planning Document.	No change

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
Cllr Elizabeth Higgins [1080]	Object	I deplore the decision regarding St Margarets House, Whitnash where double glazing was refused. This should have been passed on the grounds of energy conservation.	The individual circumstances relating to this specific application is beyond the scope of this consultation. It should be noted that this application preceded the implementation of the Sustainable Buildings SPD.	No change
Royal Leamington Spa Town Council (Robert Nash) [219]		The Town Council endorse the document as a means of encouraging more sustainable construction and design in new developments. The Council welcomes the document which provides useful guidance to both developers and the general public and hopes that following its adoption it will be widely distributed.	Comments are noted	No change
Cubbington Parish Council (Theresa Saul) [1079]	Support	Prior to this consultation Cubbington Parish Council wanted their new community pavilion to meet the criteria of the SPD. A timber log construction with insulation properties higher than the current standard was chosen.	These comments are noted	No change
Coventry City Council (Mr Thomas Gardner) [1077]		The SPD could include a sentence to state that Sustainable Building Indicators will be monitored in the AMR.	It is agreed that a sentence could acknowledge that sustainable building indicators will be monitored in the AMR.	Insert sentence in paragraph 3.6 to refer to AMR monitoring.
Warwickshire County Council (Tony Lyons) [212]	Support	We are pleased to see that there is now proposed further guidance beyond the Local Plan policy which the County Council will be able to use in its own applications for the Warwick Area.	This is noted	No change
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]	Support	Generally we welcome the document which clarifies how the Council will apply national targets and the requirements outlined in the Local Plan.	This is noted	No change
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]		Some Councils have a policy of designing for health which encourages developers to provide gardens, adequate space for drying washing etc. If it is not possible to give each dwelling a garden WDC should insist on some communal open space. In developments of 20 or more dwellings there must be a requirement to provide allotment space adjacent or within 1km. An allocation of one allotment space per 10 dwellings would be acceptable.	The Council is preparing a separate Open Space Supplementary Planning Document which will set standards for the provision of open space in new development. The provision of space to dry washing is one of the criteria in the Code for Sustainable Homes.	No change
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]		Planning Committee members will need guidance on how much weight to give to the provisions of the SPD and whether an application could be refused solely on the grounds of non compliance with sustainability requirements.	This is noted and will need to be arranged	No change
Warwickshire Rural Community Council (Linda Ridgley) [22]		Utlesford requires that extensions should not add to the energy needs of a building.	Whilst the merits of this are recognised there is no policy base in local plan policy to require this.	No change

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Natural England (Allison Crofts) [438]	Object	Recommends that an additional section is included on opportunities to promote biodiversity through buildings such as the inclusion of swift bricks, house sparrow and starling nest boxes and features to attract bats. These recommendations are supported by PPS9.	An additional section should be included in section 6 to acknowledge that some methods of sustainable construction can also contribute towards biodiversity.	Include new paragraphs in section 6 to refer to opportunities to promote biodiversity.
Coventry City Council (Mr Thomas Gardner) [1077]		Good Practice guide detailing local innovation	Reference will be made to examples of good practice within Warwick District such as the Wolseley Sustainable Building Centre	Refer to examples of good practice and where further details can be obtained in section 9.
<i>1.1</i>				
WDC Conservative Group (Cllr George Illingworth) [1085]	Support	We welcome this SPD which expands on the key policies DP11, DP12 and DP13 in the Local Plan, and will continue to influence the developing LDF.	Comments are noted	No change
<i>1.2</i>				
Bernard Perkins [645]		Note that the emissions reduction target has now been recommended to rise to 80% by 2050.	The government has now committed to increasing the emission reduction target to 80% by 2050 and this should be reflected in the SPD.	Change the UK carbon emission target from 60% to 80% in paragraph 1.2.
WDC Conservative Group (Cllr George Illingworth) [1085]		This SPD relates essentially to requirements to obtain planning permission for new developments. However the recent expansion of permitted development rights by the Government means that fewer minor developments will require planning permission and therefore the application of the SPD will be reduced. Building Regulations will still apply to these minor works and we wonder how the SPD could be used to influence good practice in those circumstances.	As pointed out the SPD only applies to developments requiring planning permission. Developments are still required to meet certain levels of energy efficiency as part of building regulations and this will be progressively tightened to meet Code for Sustainable Homes targets.	No change
<i>1.4</i>				
Coal Pension Properties Ltd [1088]	Object	Objects that the SPD will be applied to all development irrespective of the scale of development. This approach differs from emerging policy SR3 in the RSS (Preferred Options) which only requires 10% for developments of 10 dwellings or 1000 sqm and Policy DP13 which only requires 10% in appropriate residential and non residential developments. To accord with RSS and Local Plan policy paragraphs 1.4 and 4.2 should be amended to clarify that the SPD only applies to significant developments.	The SPD seeks to clarify what is meant in policy DP13 by 'in appropriate residential and non residential developments'. To do this section four contains three criteria which set out the instances where it may not be appropriate to meet all or part of the 10% requirement.	No change

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2: Policy Background				
Coventry City Council (Mr Thomas Gardner) [1077]		Page 5 could mention the Nottingham Declaration, the Planning for a Sustainable Future White Paper and how the SPD compliments the Sustainable Communities Strategy.	It is agreed that there is merit in referring to other local and regional strategies which have informed the preparation of the SPD.	Include references to the Nottingham Declaration, Warwickshire Local Area Agreement, West Midlands Sustainability Checklist and the Sustainable Community Strategy.
2.5				
NORTON LINDSEY (Mr ARTHUR FOWKES) [114]	Support	The document is not clear as to the types of Development to which this policy is intended to apply, This paragraph covers two particular types of development and elsewhere the wording intimates that others may also have to comply.The document requires restructuring to include a bold statement on which developments it will or will not apply	Paragraph 1.4 states that the requirements of the SPD will apply to all new development including extensions, redevelopments and change of use unless otherwise stated. Section 4 expands on this by outlining the instances where in line with Local Plan policy DP13 it may not be appropriate to apply the 10% requirement.	No change
3: Meeting the Requirement				
Coal Pension Properties Ltd [1088]	Object	The submission of an Energy Statement should not be necessary for all planning applications and a uniform approach should not be adopted	It is considered that the submission of an energy statement (now expanded as a Sustainable Buildings Statement) covering the points in paragraph 3.2 provides a clear framework to applicants on what is required to meet the SPD. It is recognised that some developments will not be able to meet all criteria, however, if this is the case the reasons why should be set out in the statement.	No change
Warwick Castle [192]	Object	The submission of an Energy Statement should not be necessary for all planning applications and a uniform approach should not be adopted	It is considered that the submission of an energy statement (now expanded as a Sustainable Buildings Statement) covering the points in paragraph 3.2 provides a clear framework to applicants on what is required to meet the SPD. It is recognised that some developments will not be able to meet all criteria, however, if this is the case the reasons why should be set out in the statement.	No change
Coventry City Council (Mr Thomas Gardner) [1077]		The SPD could include a structured step by step template sheet for developers to fill in and submit with their application, illustrating how the development meets the requirements set out in policy and the energy statement checklist.	Whilst the SPD provides a framework for what the Energy Statement should cover the Council does not wish to be over prescriptive in terms of the form that this should take.	No change
3.1				
Bernard Perkins [645]	Support	This is a good idea . Does the energy statement include an estimate of the energy load on the building?	In order to calculate the 10% requirement the energy statement will need to set out the expected overall energy demand of the development.	No change

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Code for Sustainable Homes (Section 6)</i>				
Mrs. Linda Bromley [1086]		More help should be provided by government and local authorities to fund flood protection for residents' homes	This is a general comment outside the remit of the SPD.	No change
Mrs. Linda Bromley [1086]	Object	Re Climate Change being responsible for flooding - I would like other factors contributing to flooding to be taken into account, such as:- Failures by the Environment Agency to provide adequate flood defences in the past Building on flood plains Inadequate drainage such as sewer systems which cannot cope with new development Concreting drives and gardens	Section 8 of the SPD recognises the contribution of increased areas of hardstanding to the incidence of surface water flooding and encourages the use of Sustainable drainage systems to address this. The other points are wider issues which are outside the remit of this SPD.	No change
<i>Preparing for Climate Change (Section 6)</i>				
Mrs. Linda Bromley [1086]		More help should be provided by government and local authorities to fund flood protection for residents' homes	This is a general comment which is outside the remit of this SPD	No change
Mrs. Linda Bromley [1086]	Object	Re Climate Change being responsible for flooding - I would like other factors contributing to flooding to be taken into account, such as:- Failures by the Environment Agency to provide adequate flood defences in the past Building on flood plains Inadequate drainage such as sewer systems which cannot cope with new development Concreting drives and gardens	Section 8 of the SPD recognises the contribution of increased areas of hardstanding to the incidence of surface water flooding and encourages the use of Sustainable drainage systems to address this. The other points are wider issues which are outside the remit of this SPD	No change
<i>Low Carbon Technologies (Section 7)</i>				
Bernard Perkins [645]		This should express a preference for sustainable CHP ie biomass as appropriate.	The checklist ensures that low carbon CHP is considered alongside other forms of renewable CHP which would be covered in the 'Implementing Renewable Technologies' section. The SPD recognises the contribution of both renewable and non renewable CHP in paragraphs 7.7 and 7.8 and recognises that where non renewable CHP is provided this can only constitute part of the requirement.	No change

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<i>Sustainable Urban Drainage (Section 8)</i>				
Mrs. Linda Bromley [1086]		<p>Re Climate Change being responsible for flooding - I would like other factors contributing to flooding to be taken into account, such as:-</p> <ul style="list-style-type: none"> Failures by the Environment Agency to provide adequate flood defences in the past Building on flood plains Inadequate drainage such as sewer systems which cannot cope with new development Concreting drives and gardens <p>More help should be provided by government and local authorities to fund flood protection for residents' homes</p>	Section 8 of the SPD recognises the contribution of increased areas of hardstanding to the incidence of surface water flooding and encourages the use of Sustainable drainage systems to address this. The other points are wider issues which are outside the remit of this SPD	No change
<i>3.3</i>				
Coal Pension Properties Ltd [1088]	Support	Welcomes the use of preapplication discussions to help ensure certainty for the developer as well as the Council.	Comments are noted	No change
<i>4: The 10% Requirement</i>				
Cllr Elizabeth Higgins [1080]		If the 10% requirement had been in place when Chase Meadow was planned solar panels could have been built in from the inception. Surely at least 25% of energy could have been produced locally.	As pointed out the Chase Meadow development was approved prior to the 10% requirement in DP13 and government guidance relating to renewables in the form of PPS22 or the PPS1 supplement.	No change
Mr M Polgreen [92]		The requirement for a given percentage of sustainable energy is pointless and unhelpful. Reduction in fossil fuel usage is required and if this can be achieved by energy conservation techniques alone that should be good enough. Instead houses should only be able to consume a predetermined quantity of energy from fossil fuels each year.	As part of meeting the 10% requirement the SPD promotes a combination of renewable and low carbon energy generation together with energy efficiency measures to reduce carbon emissions.	No change.
Warwick Castle [192]	Support	Welcome the recognition that meeting the 10% requirement may not be appropriate for all developments.	This is noted	No change
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]	Object	The 10% requirement now seems very modest and unchallenging. We would like WDC to raise this to 20% or higher. Failing that it should be made explicit throughout the document that the 10% is a minimum requirement.	Whilst it is noted that best practice has moved on since the local plan policy was written the SPD can not go beyond the requirements of DP11, DP12 and DP13. However it is likely that the requirement will be strengthened in future LDF policies.	No change

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DPP LLP (Mr Alan Williams) [624]	Object	It is considered that the policy is rather limiting in seeking the use of renewable energy sources on site or in the locality to achieve the 10% requirement. The Great London Authority has produced an Energy Hierarchy through which energy production from renewables is only categorised as tier 3. The SPD should be flexible to allow for other energy sources in particular reduced carbon technologies.	As part of meeting the 10% requirement the SPD promotes a combination of low carbon and renewable energy use together with energy efficiency encouraging an integrated approach to sustainable construction. This approach has been strengthened through the requirement for a Sustainable Buildings Statement which emphasises the need for energy efficiency.	No change
Friends of the Earth (Birgitta Ashworth) [51]		10% rule - In the context of peak oil and climate change we need to maximise the efficiency of every new building as far as is reasonably possible. The 10% rule should be regarded as an absolute minimum. Most new buildings could have solar thermal and PV panels. All buildings should be passivehouses.	Alongside the 10% requirement the SPD encourages new development to be designed to a high level of energy efficiency to reduce the overall energy demand of the development.	No change.
4.2				
Coal Pension Properties Ltd [1088]	Object	Objects that the SPD will be applied to all development irrespective of the scale of development. This approach differs from emerging policy SR3 in the RSS (Preferred Options) which only requires 10% for developments of 10 dwellings or 1000 sqm and Policy DP13 which only requires 10% in appropriate residential and non residential developments. To accord with RSS and Local Plan policy paragraphs 1.4 and 4.2 should be amended to clarify that the SPD only applies to significant developments.	The SPD seeks to clarify what is meant in policy DP13 by 'in appropriate residential and non residential developments'. To do this section four contains three criteria which set out the instances where it may not be appropriate to meet all or part of the 10% requirement.	No change
NORTON LINDSEY (Mr ARTHUR FOWKES) [114]		Para.4.2 illustrates the previous comment. DP13 states 'APPROPRIATE DEVELOPMENT.Para.4.2 states 'ALL DEVELOPMENTS' and then goes on to prescribe various scenarios?	The SPD seeks to clarify what is meant in DP13 by appropriate developments. To do this the policy is applied to all development unless it can be demonstrated that it meets one of the criteria in section 4.	No change.
4.3				
Coal Pension Properties Ltd [1088]	Support	Welcome the recognition that meeting the 10% requirement may not be appropriate for all developments and supports that the SPD recognises the difficulties faced on constrained town centre locations.	Comments are noted	No change
4.4				
Coal Pension Properties Ltd [1088]	Support	Support the inclusion of para 4.4 which identifies the potential conflict between the provision of renewable technology and the preservation of the historic environment	Comments are noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
Warwick Castle [192]	Support	Support the inclusion of para 4.4 which identifies the potential conflict between the provision of renewable technology and the preservation of the historic environment	Comments are noted	No change
Bernard Perkins [645]		The important point is that as the need to address climate change becomes more intense the balance between preservation planning constraints and renewable development may change. The developer should therefore always try to meet the obligation.	It is agreed that the obligation should be on the developer to meet the requirement. However Section 4 allows for circumstances where it is not possible, for other planning reasons, for the development to meet the entire requirement.	No change
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4.5				
WDC Conservative Group (Cllr George Illingworth) [1085]		We agree with 4.85 of DP13 that many renewable energy projects will be inappropriate development in the Green Belt, and note this is a much clearer statement than 4.5. However even 4.5 appears in conflict with 7.3 which rightly sees urban areas as an unsuitable location for large scale wind turbines.	The SPD does not preclude the development of wind turbines in either location but seeks to make applicants aware that potentially there may be other factors to take into account.	No change
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4.6				
Coal Pension Properties Ltd [1088]	Support	Support the inclusion of para 4.6 which identifies the importance of maintaining financial viability and not undermining the the delivery of development.	Comments are noted	No change
Bernard Perkins [645]		This depends alot on how costs are calculated. There is an argument for requiring full life cycle costings.	This criterion is intended to cover instances where the cost of implementing renewables would make the development unviable. It would not preclude the installation of renewables on the grounds that it would be higher than standard building costs but apply in cases where there are other financial factors which would undermine the delivery of the scheme. This may include very small householder applications.	No change
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WDC Conservative Group (Cllr George Illingworth) [1085]		As the economic benefits of some renewable energy systems are less certain than the energy benefits this paragraph may provide a larger loophole than intended. It might, for example, be used to avoid the requirement for affordable housing or other similar planning gains.	This criterion is only intended to cover exceptional circumstances where there are other financial factors (other than the fact that implementing renewables is higher than standard building costs) which would undermine the delivery of the scheme. It relates to the provision of renewables only and would not allow the applicant to avoid other planning contributions.	No change
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4.9				
DPP LLP (Mr Alan Williams) [624]	Object	It is noted that paragraph 4.9 makes provision for a reduction in the 10% requirement if CHP is provided. This should be given greater emphasis in recognition of the alternative approaches which can be used to meet the same aims and objectives.	Whilst the contribution of low carbon technologies is recognised these measures alone are not sufficient in addressing climate change. The SPD aims to promote an integrated approach to sustainable construction which combines energy efficiency and low carbon technologies, to reduce the overall energy demand of the development, with the use of renewables. The structure of the new Sustainable Buildings Statement reflects this approach.	No change
5: Calculating the Renewables Requirement				
5.2				
Bernard Perkins [645]		Energy efficiency should have primacy over renewables. The developer should reduce the energy load first.	In section 5, stage 1 of meeting the 10% requirement requires applicants to maximise energy efficiency prior to installing renewables to ensure that the overall energy demand is as low as possible.	No change
Cllr George Illingworth [1083]	Object	The highlighted statement implies that a building designed to the highest energy saving standards but with no renewable energy source is less acceptable than a less efficient building with a higher energy demand of which 10% is renewable. This is illogical as the non-renewable energy demand of the former will be less than the 90% of the latter. Are we not in danger of encouraging the wrong approach?	It is unlikely that this situation would happen given that the SPD and DP12 encourages energy efficiency and it is in the applicants interests to maximise this to reduce the amount of renewable technology needed to meet the 10%. Also to meet one of the criteria in section 4 (which sets out the circumstances where it may be inappropriate to implement renewables) the applicant would need to demonstrate that the development had been designed to a high level of energy efficiency. This will be strengthened by expanding paragraph 4.2 to ensure that development has been designed to maximise energy efficiency.	Amend Paragraph 4.2 to ensure that development has been designed to maximise energy efficiency.
Warwickshire Rural Community Council (Linda Ridgley) [22]	Object	It is a bit draconian to expect 10% in all circumstances given that a really well built home may only need a very small input of energy. In general agree with demanding more energy efficiency.	There is flexibility within the SPD for instances where the 10% requirement may not be appropriate. In all instances the Council will expect new development to be designed to maximise energy efficiency and this has been strengthened in paragraph 4.2.	No change
Kenilworth Town Council (Councillor Norman Vincett) [81]	Object	Objects to the contradiction between sections 4 and 5 with regard to new development and home extensions. There is concern that some developers may try to thwart the objectives while domestic extensions may be unreasonably denied particularly in older un insulated properties where using latest building regulations without applying renewables could achieve a greater energy saving.	Section 4 allows for instances where it may not be appropriate to meet the 10% requirement such as in the case of small house extensions. In cases where the 10% is appropriate stage 1 of meeting this requirement is the need to ensure that energy efficiency is maximised.	No change

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<i>5.11</i>				
Coal Pension Properties Ltd [1088]	Object	Renewables toolkit should be attached as an appendix and consulted on separately prior to the adoption of the SPD.	It is intended that the renewables toolkit will be attached as an appendix to the SPD. It is anticipated that consultation will be undertaken with relevant stakeholders as part of the preparation of a toolkit. It is not, however, necessary to delay adoption of the SPD as it covers a wider range of issues than the 10% requirement and expands on existing adopted policies.	No change
Kenilworth Town Council (Councillor Norman Vincett) [81]		It is questioned whether the renewable toolkits are representative. Do they consider acquisition in terms of carbon costs and whole life costs (reliability / maintainability) that would contribute to future carbon footprint through spares. Does the toolkit compare the relative merits of different types of renewable energy sources.	It is anticipated that the toolkit will provide information on the energy demands of different types of uses and enable applicants and officers to calculate the energy contribution which would be provided through the chosen renewables system. It will also allow a comparison to be made of the energy performance of different types of renewables.	No Change.
<i>6: Sustainable Layout and Building</i>				
Cllr Elizabeth Higgins [1080]		In Canada municipal buildings are heated and lit by the people inside, when will this technology be commonplace in buildings here?	The SPD encourages the use of energy efficiency measures to reduce carbon emissions.	No change
Natural England (Allison Crofts) [438]		Recommends that British Standard 5837 Trees in Relation to Construction Recommendations (2005) are referred to.	It is not considered necessary to specifically refer to this guidance however it may be important when considering individual schemes.	No change
Natural England (Allison Crofts) [438]	Object	The SPD is an opportunity to provide guidance on how sustainable construction can help deliver Policy DAP3 Protecting Nature Conservation, Geology and Geomorphology. This could be achieved by including information in Section 6 on green infrastructure such as formal and informal green spaces around buildings which can fulfil many functions. These include opportunities for climate change adaptation through the provision of corridors for wildlife movement, cooling through tree shade and opportunities for recreation and leisure.	The Council is preparing a separate supplementary planning document on Open Space which will refer to green infrastructure. There is however, merit in acknowledging that some methods of sustainable construction might also contribute towards the requirements of DAP3 and DP3 and in particular provide opportunities for climate change adaptation.	Include additional paragraph in section 6 to acknowledge the opportunities for climate change adaptation and for improving biodiversity.
<i>6.3</i>				
NORTON LINDSEY (Mr ARTHUR FOWKES) [114]		This requirement is draconian in that more houses using minimum land will preclude this type of development and orientation. While the theory is to be applauded, practice will be hard to achieve.	It is agreed that the most appropriate layout and orientation to maximise passive solar gain may not in all circumstances accord with other design and layout considerations such as making best use of land. This is recognised in paragraph 6.6 of the SPD.	No change

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6.7				
Bernard Perkins [645]		Systems for night time venting can help with building temperature management to as temperatures rise.	This comment is noted	No change
Mr M Polgreen [92]		There is no mention of house ventilation. There is a limit to how well a house can be insulated because houses must be ventilated to control moisture levels and maintain a supply of fresh air. Using heat exchanged ventilation the heat from waste air leaving a building can be transferred to fresh air entering it so little or no additional energy is required to heat the incoming air to maintain room temperature. This can also be used when it is hotter outside than in to keep the inside cooler.	New houses are required to comply with building regulation standards for ventilation. Paragraph 6.7 of the SPD acknowledges the need to encourage natural air circulation through measures such as the positioning of windows. Heat exchanged ventilation is an energy efficiency measure which would be encouraged through the SPD.	No change
6.9				
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]		It is difficult to ascertain when certain targets are to be met. For example the SPD encourages all new housing to meet level three of the Code for Sustainable Homes. However if new housing is to meet zero carbon by 2016 then new development starting 2009/10 should be designed to level 4, 5 or ideally 6.	Include a new section on the Code for Sustainable Homes and BREEAM standard and reference to these in the revised Energy statement (now Sustainable Buildings Statement).	No change
7: Renewable Energy Technologies				
Coventry City Council (Mr Thomas Gardner) [1077]		The SPD could include: More information on technologies and their relative suitability (e.g. through flowcharts outlining guidelines for site location of different technologies).	It is considered that this would be an over complicated mechanism through which to guide applicants particularly as the performance of different renewables is often dependant on local conditions. For this reason it is more appropriate to provide general information in order that more detailed analysis should be undertaken by the applicant on a site by site basis.	No change
NORTON LINDSEY (Mr ARTHUR FOWKES) [114]		A good addendum to the document but is not policy and will quickly outdate due to developments. This section should be relegated to an appendix. It is a criticism of this document as a whole that too much detail confuses the policy issues and should be attached as appendices as they confuse the policy.	It is recognised that this is a fast moving area of expertise and that the technology is subject to change. To address this an additional sentence should be included in section 7.	Include additional sentence at the start of section 7 to state 'This section is based on current understanding of the technology available. It is recognised that this is a fast moving area subject to change'.

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Mr M Polgreen [92]		The emphasis on solar heating and photo voltaics might be appropriate on the south coast but is over done for Warwickshire because there is reduced solar radiation due to our latitude and substantially more cloudy skys. It isnt true that photo voltaics are nearly as effective on a cloudy day as on a sunny day. Data shows (for herefordshire) that the total solar radiation on a cloudy day in winter is about one tenth of that on a sunny day in summer.	The SPD refers to solar thermal and photovoltaics alongside a range of other renewable options and no preference is given to a particular type. It is recognised that renewable technologies will perform differently in different locations and this should be taken into account when deciding which to install.	No change
Bernard Perkins [645]		Design for renewables should take into account the current research evidence on performance. Actual performance might be highly site specific . So the planners need to consider the evidence base for the predictions of renewables perfrmance put forward by the developer.	It is recognised that renewable technologies will perform differently depending on site location and the type of development. This is acknowledged in stage 3 of the framework for Calculating the Renewables Requirement which requires applicants to assess different renewables and demonstrate why the chosen method is the most suitable for the site.	No change
7.3				
WDC Conservative Group (Cllr George Illingworth) [1085]		Paragraph 7.3 should also refer to DAP12 and the Airport Safeguarding Composite Information Plan in the Local Plan which bans all Wind Farm development in most of the northern half of the District.	DAP12 does not ban wind farm development in the areas shown on the Airport Composite Information Plan but states that it will not be permitted if it inhibits the safe operation of an aerodrome or technical site. It is agreed, however, that an additional sentence should be included to make applicants aware of this potential consideration.	Include sentence to refer to the potential constraints imposed through DAP12.
Friends of the Earth (Birgitta Ashworth) [51]		Areas of maximum wind tend to be open spaces and wind turbines will be visible. The presumption should be that they are allowed in most places provided they will work efficiently. Warwick District Council recently approved the installation of photovoltaic panels on a conspicuous gable end wall of a Victorian House in a conservation area. Representatives of all the political parties decided that fighting climate change was more important than preserving architectural niceties.	Section 7 provides specific guidance on implementing renewables in the historic environment. This does not preclude the use of wind turbines but recognises the need for the design and siting to minimise the potential visual impact on the character of the building or conservation area.	No change
7.4				
Mr M Polgreen [92]		Supports the use of log burning stoves when the logs have been produced sustainably (e.g waste wood). This has a good chance of providing 10% of energy sustainably.	This comment reinforces paragraph 7.4 which requires that biofuels come from a sustainable source in close proximity to the boiler to avoid unnecessary transportation.	No change

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
7.11				
Coal Pension Properties Ltd [1088]	Support	Supports the recognition that the installation of renewables can detract from the historic integrity of the building but appreciates that with careful consideration some installations may be appropriate within the historic environment	These comments are noted	No change
Warwick Castle [192]	Support	Supports the recognition that the installation of renewables can detract from the historic integrity of the building but appreciates that with careful consideration some installations may be appropriate within the historic environment	These comments are noted	No change
7.12				
WDC Conservative Group (Cllr George Illingworth) [1085]		PV (and solar) panels or tiles are not acceptable even on unlisted buildings in conservation areas except when hidden from public view on rear or hidden roof slopes. If this is the intended policy, with which we fully agree, then it should be clearly stated rather than just implied.	It is agreed that the guidance on PV panels and solar thermal needs further clarification as to what will be acceptable.	Amend the paragraphs on PV and solar thermal technologies to provide clearer guidance and clarify that such technologies will not be acceptable in the historic environment unless hidden from public view or on rear or hidden roof slopes.
8: Sustainable Water Management				
Friends of the Earth (Birgitta Ashworth) [51]		Water Conservation should not just be encouraged but should become the norm.	The SPD can only expand upon the wording of adopted local plan policy, in this case DP11, which encourages rather than requires the use of water conservation measures. Future policies in the Core Strategy may provide a stricter framework.	No change
Natural England (Allison Crofts) [438]	Support	Support Section 8 and suggest that the text is expanded to require that opportunities should be sought to integrate biodiversity benefits (delivery of wetland habitat) into SUDs schemes wherever possible.	It is agreed that the SPD could recognise the potential biodiversity benefits which can be introduced through the use of sustainable drainage systems.	Include additional wording in Paragraph 8.2 to refer to biodiversity benefits of certain sustainable drainage systems.
WDC Liberal Democrat Group (Cll Ann Blacklock) [1090]	Object	The section on sustainable water management should be more mandatory and less advisory. For example in para 8.9 if SUDs are not used this will result in the application being refused.	The SPD reflects the wording of DP11 which encourages rather than requires the use of sustainable drainage systems. However if SUDs are not used applicants are required to demonstrate why this is the case.	No change

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Action</i>
8.1				
NORTON LINDSEY (Mr ARTHUR FOWKES) [114]		Flooding in urban areas is undoubtedly the result of these issues, flooding in rural areas is caused by water flooding onto the roads as the ditches which used to control and hold large amounts of water are no longer kept clean and free and in many cases filled in. This results in the water exiting the land quicker and in many cases overloading the Drainage systems	This is noted however the maintenance of ditches is dealt with by other organisations and is outside the remit of planning.	No change
8.4				
WDC Conservative Group (Cllr George Illingworth) [1085]		Paragraph 8.4 should be updated to reflect the removal of permitted development rights for the use of impermeable paving on domestic driveways.	It is agreed that paragraph 8.4 should be amended to reflect the new legislation.	Amend paragraph 8.4 to state 'The government has recently removed permitted development rights to pave domestic driveways using impermeable paving'.
Kenilworth Town Council (Councillor Norman Vincett) [81]		Paragraph 8.4 should be updated to reflect the removal of permitted development rights for the use of impermeable paving on domestic driveways.	It is agreed that paragraph 8.4 should be amended to reflect the new legislation.	Amend paragraph 8.4 to state 'The government has recently removed permitted development rights to pave domestic driveways using impermeable paving'.
Cllr Elizabeth Higgins [1080]	Support	Applauds the decision to use permeable paving on all drives.	This comment is noted	No change
8.8				
WDC Conservative Group (Cllr George Illingworth) [1085]		Paragraph 8.8 states that an applicant is simply required to indicate where applicable who will be responsible for the maintenance of these systems. As maintenance is a crucial factor in long-term successful operation is it not possible to condition the maintenance in a more binding way?	To strengthen this, the sentence will be amended to require the applicant to indicate who will be responsible for the management of the systems and how they will be maintained. It may be possible to further strengthen this requirement in future policies.	Change sentence in paragraph 8.8.