



# Reigate & Banstead Climate Change and Sustainable Construction Supplementary Planning Document

Sustainable Development Guide

## **APPENDIX 2**

### **Initial Consultation Statement**

Prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012

February 2021

If you would like this document in a different format, Braille, large print, or audio, or in a different language, please contact the Planning Policy Team at:

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## 1. Introduction

- 1.1 The UK government is seeking to achieve a target of net zero carbon emissions by the year 2050, and planning can provide an important contribution towards achieving this. Alongside this objective is a range of other emerging environmental and sustainability policy and guidance at national and local levels. This SPD has therefore been drafted in response to this changing policy landscape, regarding climate change mitigation - and adaptation to a changing climate - and related issues such as energy/water supplies and waste management.
- 1.2 The purpose of this SPD is to support and expand upon policy set out in Reigate & Banstead Borough Council's adopted Local Plan - Core Strategy 2014 reviewed in 2019, and Development Management Plan (DMP), adopted in 2019. This contains policies supporting climate change mitigation and adaptation, energy and water conservation, and other environmental and sustainability issues.
- 1.3 This statement has been prepared to accompany the draft Climate Change and Sustainable Construction Supplementary Planning Document (SPD) that has been made available for public consultation, in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, setting out: who has been consulted during the preparation of the SPD; a summary of the issues raised; and a description of how those issues raised have been addressed.

## 2. Preparing the SPD

- 2.1. The draft Climate Change and Sustainable Construction SPD has been prepared in accordance with the legal requirements of the Town and Country Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations)<sup>1</sup> and the requirements set out in the Council's Statement of Community Involvement in Planning (SCI) (April 2019)<sup>2</sup>. The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs. The process is summarised in Figures 1 and 2 below.

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<sup>1</sup> Available: <https://www.legislation.gov.uk/ukxi/2012/767/regulation/12/made>

<sup>2</sup> Available: [http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement\\_of\\_community\\_involvement\\_in\\_planning.pdf](http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement_of_community_involvement_in_planning.pdf)

Figure 1: Process of Preparing a Supplementary Planning Document

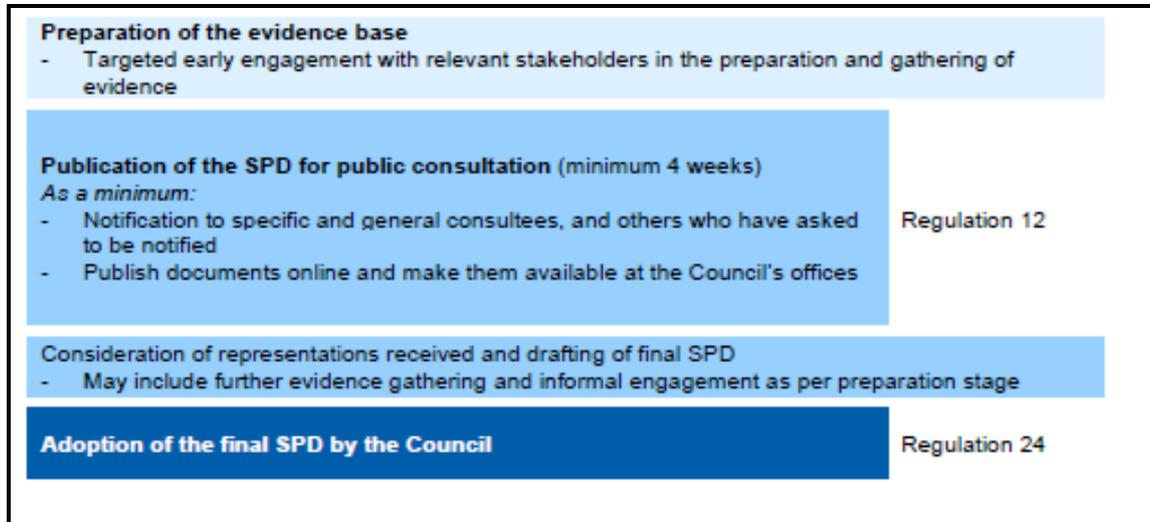


Figure 2: Timeline for preparation of the SPD

Stage	Dates
Early scoping and information gathering	April 2020 – July 2020
Preparation of draft SPD with relevant key individuals and organisations	August 2020 – February 2021
Consultation on draft SPD with supporting Initial Consultation Statement; Strategic Environmental Assessment (SEA); Habitats Regulations Assessment (HRA); and Equalities Impact Assessment screening	March 2021 – April 2021
Consider representations received and update draft SPD as appropriate	May 2021
Adoption of the SPD by the Council's Executive	October 2021
Publish SPD with final consultation statement, and Adoption of the SPD	October 2021

2.2 In preparing the draft document we have sought the views of the individuals and organisations listed in Table 1. Their suggestions/concerns have been considered, and changes made to the document as appropriate, as set out in Table 2.

*Table 1: Individuals and organisations involved in preparing the draft SPD*

<b>Individuals/groups consulted</b>	<b>When and how consulted</b>
Development Management/head of planning service (RBBC)	First draft issued October 2020; subsequent draft sent to head of service in January 2021; comments received
Corporate officer (RBBC)	First document draft sent out October 2020; comments received
Sustainability officer (RBBC)	First draft issued October 2020; comments received; meeting autumn 3020; subsequent draft issued January 2021; additional comments received
Conservation officer (RBBC)	First draft issued October 2020; comments received
Greenspaces officer (RBBC)	First draft issued October 2020; comments received
Additional planning policy officer input (RBBC)	First draft issued October 2020; comments received
Environmental health officer (RBBC)	First draft issued October 2020 (question re charging points); comments received
Cross Member Party Sustainability Group (CMPS) (RBBC)	Pre-DMAG draft issued; comments received (individual councillor)
Development Management Advisory Group (DMAG) (RBBC)	Pre-DMAG draft issued, and Zoom meeting held/notes taken

Table 2: Issues raised and alterations to the draft SPD

Chapters	Issues raised and Responses
General document	<ul style="list-style-type: none"> <li>- Concern expressed on how a slow system such as planning policy would keep up to date with fast-changing technology such as renewables or electric vehicle charging etc. (DMAG)</li> </ul> <p>This SPD has been kept relatively generic/high-level regarding specific technologies and does not discourage new technologies.</p> <ul style="list-style-type: none"> <li>- DMAG asked for the title to be more reflective of the document's contents.</li> </ul> <p>Guide for Sustainable Development has been added below SPD for clarity.</p>
General document	<ul style="list-style-type: none"> <li>- RBBC corporate/sustainability officers suggested that chapter summaries (with headline requirements) and a possible abridged version for householders would be useful in making the document readable/useable for the majority of people. Corporate officer suggested the draft SPD needed to be clearer about expectations, with the inclusion of a summary of what needs to be done for a planning permission.</li> </ul> <p>Each chapter includes a section on Planning Applications and what is expected – and there is a Checklist at the end of the document for use by applicants. These have been updated and rationalised through iterations of the document. Additional section summaries were considered but ruled out to avoid repetition. An alternative residents' version of the document was ruled out due to time constraints.</p>
General document	<ul style="list-style-type: none"> <li>- RBBC corporate/sustainability officers suggested some description be placed in appendices.</li> </ul> <p>Some information moved to appendices to improve clarity and accessibility.</p>
General document	<ul style="list-style-type: none"> <li>- Diagrams/images considered very useful – SCC sustainability/corporate officers (re separate iterations) and DMAG</li> <li>- Additional policy officer advice – regarding 'accessibility' formatting.</li> </ul> <p>Incorporated as necessary.</p>

Chapters	Issues raised and Responses
General document	<ul style="list-style-type: none"> <li>- The strength of requirements and whether actions should be mandatory or recommended, etc (language used/more positive) was raised by RBBC sustainability/corporate officers (after different iterations), SCC’s sustainability officer, and DMAG. The word ‘could’ has been replaced by ‘should’ as appropriate in the document, but officers remain mindful that further strengthening of language could effectively be seen as introducing new policy when SPDs can only be used as an amplification of existing local plan policy.</li> </ul>
General document	<ul style="list-style-type: none"> <li>- RBBC conservation officer – concerned that all measures suggested are sensitively designed regarding local distinctiveness, conservation impacts, and good design, ensuring negative aesthetic impacts are minimised</li> </ul> <p>This has been addressed throughout, including regarding specific issues raised by the conservation officer. Chapter 9 details approached to heritage assets.</p>
General document	<ul style="list-style-type: none"> <li>- Discussion regarding the efficiency of lighting, within buildings and for street lighting, and avoidance of light pollution. (DMAG)</li> </ul> <p>Outside of the range of this document.</p>
Introductory (Chapters 1, 2, and 4)	<ul style="list-style-type: none"> <li>- Clarity re organisations, national targets, and corporate targets (Corporate officer)</li> <li>- Discussion re terminology for the energy hierarchy approach (initially as per London Plan) (Corporate officer)</li> </ul> <p>Removed London Plan terminology for plain language. Further information/detail included.</p>
Introductory (Chapters 1, 2, and 4)	<ul style="list-style-type: none"> <li>- Emphasis on synergies between climate and other sustainability issues – useful (SCC sustainability officer)</li> <li>- Additional wording re adaptation – ‘resilience’ (SCC sustainability officer)</li> </ul> <p>Included, and further emphasised.</p>

Chapters	Issues raised and Responses
<p>Introductory (Chapters 1, 2, and 4)</p>	<ul style="list-style-type: none"> <li>- Inclusion of biodiversity net gain/biodiversity ‘credits’ (SCC sustainability officer/others as noted for Chapter 7)</li> </ul> <p>Biodiversity is referenced, but it is agreed that this is a broad subject area meriting further guidance at a later stage.</p> <ul style="list-style-type: none"> <li>- Carbon Reduction Statements – question regarding how carbon savings would be monitored; how they would be checked; and how enforcement would be applied if the savings were not met (RBBC head of service)</li> </ul> <p>This is covered to some extent, but additional information may be added following public consultation.</p>
<p>Chapter 3 Location and linkages</p>	<ul style="list-style-type: none"> <li>- RBBC head of service – suggested link to Surrey Design or the Emerging Local Distinctiveness Design Guide update regarding street design for larger sites.</li> <li>- CMPS (individual councillor) felt that inclusion of permeable design for pedestrians was important.</li> </ul> <p>Existing wording has been strengthened and further references included on safe places and active frontages.</p>

Chapters	Issues raised and Responses
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- General agreement that reduction in car use is important, including SCC’s sustainability officer; DMAG; and an individual councillor from the CMPS, but some aspects have been noted as missing -               <ul style="list-style-type: none"> <li>o Car-clubs – more consideration (regarding two draft iterations) (RBBC sustainability officer)</li> <li>o Improvements for home-working (discussed at DMAG regarding connectivity e.g. to internet)</li> <li>o 20mph zones reference – possible air-quality issues (comment from additional planning policy officer)</li> </ul> </li> </ul> <p>Wider information on home-working has been considered, but would be attached to other policies, so would not be under the remit of this SPD.</p> <p>Car-clubs was considered but is covered adequately under the Local Plan’s policies.</p> <p>The 20mph issue has been addressed through additional wording.</p>
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- Addition of advice/requirements regarding developer contributions towards public transport (especially where parking will be reduced) was raised by CMPS (individual councillor)</li> </ul> <p>Policies TAP1 and CS17 set out requirements for Transport Assessments and developer contributions. Further expansion of this information may require separate guidance.</p>
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- Regarding electrical vehicles and charging points – SCC’s sustainability officer and CMPS (individual councillor) agreed EV charging would be important going forwards. DMAG were concerned technology would be superseded (Corporate officer had also raised this issue re future-proofing).</li> </ul> <p>EV charging points are a policy requirement – in accordance with government support for electric vehicles – and RBBC’s Environmental Sustainability Strategy (a reference to which has been added to the text).</p>

Chapters	Issues raised and Responses
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- EV charging - DMAG concerned whether electrical generation for EV would be decarbonised.</li> </ul> <p>It is not possible for Local Planning Authority to stipulate that electrical charging points are using decarbonised power. Either way local air quality can be improved.</p>
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- RBBC environmental health officer noted that particulates are reduced from tail pipes with electric vehicles, but not from tyres. Also provided some updates on diesel/petrol vehicle bans.</li> <li>- RBBC environmental health officer suggested inclusion of wording re vehicle to grid (V2G) operation.</li> <li>- Advised a charging point per house, given the immediacy of the changes.</li> </ul> <p>Text amended, and regarding level of provision - reference to the DMP policy.</p>
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- EV charging points could be kept to a 7kW minimum to avoid over-draining of the system by vehicles with faster charging capacities. (DMAG).</li> </ul> <p>Proposed wording based upon advice from RBBC’s environmental health officer, that the standard for Europe is a ‘type 2’ socket. The type 2 socket runs to 22kW. There is a lower 7kW ‘type 1’ socket, but this is used rarely in Europe – more so in Asia. However, a requirement has been included that commercial developments also use the type 2 socket, not a faster rate.</p>
Chapter 3 Location and linkages	<ul style="list-style-type: none"> <li>- Reduce clutter/illumination of EV charging points (RBBC conservation officer)</li> <li>- Reference to sustainable transport in the checklist (RBBC sustainability officer)</li> </ul> <p>Wording included or checked in response to these issues.</p>

Chapters	Issues raised and Responses
Chapter 5 Passive design	<ul style="list-style-type: none"> <li>- RBBC Conservation officer – concerned that orientation of buildings does not create an over-regimented effect, and all aspects of the chapter subject to design considerations, including traditional dry-lining for insulation on some traditional buildings.</li> </ul> <p>Advice taken regarding wording for all of this.</p>
Chapter 5 Passive design	<ul style="list-style-type: none"> <li>- CMPS (individual councillor) - noted that passive design had been discussed in the chapter, but not ‘passivhaus’ (especially re insulation). A policy officer also raised the issue re specific targets not being appropriate under the Council’s own Local Plan policies.</li> </ul> <p>This section is on the wider concept of ‘passive design’ which is being used as part of achieving the Council’s own policy standards, as set out in Local Plan policy; Passivhaus is a form of passive design, but with very specific targets of its own. (Insulation is included in the chapter on passive design.)</p>
Chapter 5 Passive design	<ul style="list-style-type: none"> <li>- Suggestion of including use of reflective paint (DMAG)</li> </ul> <p>This has been included as a potential solution, but there are many situations where this would not be appropriate.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Possible confusion over terminology/chapter content – e.g. low/zero carbon; renewables; residual energy etc (including SCC’s sustainability officer/Member of Cross Member Party Sustainability Group)</li> </ul> <p>The introduction has been re-drafted to improve clarity.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- RBBC Conservation officer – concerned that all measures suggested are sensitively designed regarding local distinctiveness; conservation impacts; good design; and ensuring negative aesthetic impacts are minimised – including siting and appearance of PV/solar panels.</li> </ul> <p>Advice adhered to in document including additional information on the siting of PV/solar panels.</p>

Chapters	Issues raised and Responses
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- RBBC conservation officer - concerned with the efficacy of wind turbines.</li> <li>- Planning considerations associated with wind power possibly a little too negative sounding - CMPS (individual councillor)</li> </ul> <p>Text redrafted, but there remain important planning considerations with wind power.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Issue raised regarding the visual/aesthetic requirement for applications for wind/solar energy farms. (DMAG)</li> </ul> <p>This is beyond the current remit of this document.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Whether green (or living) roofs provide additional benefit to the running of solar PV systems, as noted in the draft – or whether the benefits are separate (SCC sustainability officer)</li> </ul> <p>Further information included. Research shows that green roofs can enable optimum ambient temperatures for the panels, and reduce dust on them, therefore improving their efficiency. (Also benefits to biodiversity through shade etc included in Chapter 7)</p> <ul style="list-style-type: none"> <li>- Policy officer noted the possibility of bird strike associated with solar panels.</li> </ul> <p>Addressed in the document text – and for green roofs.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Agreed heat pumps/renewables/zero-carbon technology all important to include - SCC sustainability officer/CMPS (individual councillor)</li> <li>- RBBC conservation officer/additional planning policy officer questioned CHP and air quality issues.</li> </ul> <p>Addressed in the text.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Wastefulness of grid transmission, therefore need for locally generated power (DMAG)</li> </ul> <p>Further emphasis on the importance of local power generation and heat sources included.</p>

Chapters	Issues raised and Responses
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- RBBC conservation officer noted various checks/studies (eg archaeological) to be carried out for the installation of ground-source heat pumps</li> </ul> <p>Addressed in the text.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Discussion over the additional inclusion of water-source heat pumps [DMAG/CMPS (individual councillor)] with members noting that these are a very efficient kind of heat pump. It was noted they are useful where balancing ponds are installed.</li> <li>- DMAG noted that correct heating systems (large radiators /under-floor heating) required for use with heat pumps.</li> </ul> <p>Water-source heat pumps have been included – including for developments close to or needing to install balancing ponds.</p> <p>Wording added regarding need for suitable heating systems for air-source heat pumps and other similar technologies.</p>
Chapter 6 Low-carbon power and heating	<ul style="list-style-type: none"> <li>- Biomass – The initial draft SPD included a section on biomass which was removed after issues of air-pollution were raised by RBBC officers (including Corporate officer, and conservation officer). DMAG suggested that it could be considered for rural/village areas, as long as the document set out the pros and cons clearly – including: travel distance for biomass fuel chips; economies of scale; and ease of use of the technology for residents. RBBC head of service also questioned the omission of biomass.</li> </ul> <p>Section re-instated, including reference to travel distance of fuel, and with the additional requirement that this is considered only for areas that are not very populated, and that ease of use of heating systems is considered.</p>

Chapters	Issues raised and Responses
<p>Chapter 6 Low-carbon power and heating</p>	<ul style="list-style-type: none"> <li>- Guidance for off-site renewables, where not viable on-site (as per policy CCF1) (RBBC sustainability officer)</li> </ul> <p>A note regarding this has been included.</p> <ul style="list-style-type: none"> <li>- RBBC sustainability officer – strengthening of energy monitoring provisions</li> </ul> <p>‘Whole life’ carbon assessment is a specialist developing field which would be very challenging for planners to monitor at present.</p>
<p>Chapter 7 Green Infrastructure</p>	<ul style="list-style-type: none"> <li>- RBBC conservation officer – concerned that all new developments incorporate sufficient/appropriate planting – and although there is a need to consider climate change in choice of species (as document noted), many native species will still tolerate extreme conditions (need for a balanced approach).</li> </ul> <p>All addressed as advised in the document.</p>
<p>Chapter 7 Green Infrastructure</p>	<ul style="list-style-type: none"> <li>- Green Infrastructure/sequestration – attracted support for mature trees and removal should be avoided by designing around them etc [DMAG/ CMPS (individual councillor)] – also wetlands and hedgerows (SCC sustainability officer).</li> <li>- Welcome compensatory approach to loss of habitats/other references re species - CMPS (individual councillor)/RBBC sustainability officer.</li> <li>- DMAG requested that the loss of mature trees should be included as a minus in Carbon Reduction Statements carbon calculations.</li> </ul> <p>The draft versions of the SPD contained a section on sequestration through planting/trees in general (including regarding the importance of mature trees for carbon capture, and the need to protect them) – but some additional emphasis plus wetlands/hedgerow importance has been added – and that the loss of mature trees should be included as a minus in Carbon Reduction Statements calculations.</p>

Chapters	Issues raised and Responses
Chapter 7 Green Infrastructure	<ul style="list-style-type: none"> <li>- RBBC greenspaces officer – issues regarding suitability of tree species for sequestration</li> </ul> <p>Additional information included.</p>
Chapter 7 – Green Infrastructure	<ul style="list-style-type: none"> <li>- Additional information re urban greening to add (RBBC sustainability officer) – including planting of native/pollinator species. Also, corridors/buffers (RBBC conservation officer)</li> <li>- Corporate officer suggested links to: Green Infrastructure Strategy (and policy officer) – expand upon in relation to Climate Change; wider implications for tree planting (with reference to SCC’s Tree Planting Strategy); and Biodiversity Opportunity Areas (BOA).</li> </ul> <p>The greening section has been strengthened and includes reference to the Council’s Green Infrastructure Strategy, SCC’s Tree Planting Strategy, and BOAs. However, this document is not primarily about greening/biodiversity per se – which may require further guidance.</p>
Chapter 7 – Green Infrastructure	<ul style="list-style-type: none"> <li>- Biodiversity net gain – RBBC and SCC sustainability officers suggested the inclusion of more information about biodiversity net gain, such as the ‘selling’ of offsets to developers.</li> <li>- RBBC’s head of planning suggested the inclusion of a reference to DMP policy NHE2 regarding biodiversity net gain.</li> </ul> <p>A reference to Local Plan policy has been included, but further discussion regarding net gain is not included in this document because, whilst potential benefits to wildlife and habitats has been discussed throughout, specific discussion regarding biodiversity net gain is left out as warranting a wider, separate policy document.</p>

Chapters	Issues raised and Responses
Chapter 8 – Water resources	<ul style="list-style-type: none"> <li>- Need for a water resources section in sustainability SPD (SCC sustainability officer) – including re greywater recycling to be robust</li> <li>- Green roofs and avoiding rainwater pooling (SCC sustainability officer)</li> </ul> <p>Included this in addition to other attenuation mentioned/section already included in draft. There is a section on greywater recycling.</p>
Chapter 9 – Heritage assets	<ul style="list-style-type: none"> <li>- RBBC’s conservation officer raised a variety of practical and specific issues in relation to the preservation or renovation of historic buildings, and in regard to the need for permissions and/or consents.</li> </ul> <p>Most of this expertise has been considered for this chapter and incorporated into the document as a whole.</p>
Chapter 10 – Sustainable Construction	<ul style="list-style-type: none"> <li>- Materials – modern methods of construction (MMC) was suggested for inclusion (SCC sustainability officer); and there was a question about different types of materials for building</li> </ul> <p>This chapter covers materials used and sustainability in some depth already.</p>
Chapter 10 – Sustainable Construction	<ul style="list-style-type: none"> <li>- Waste stream separation – was discussed as to whether it could be problematic, and in terms of suitability for the site or materials concerned – DMAG/ CMPS (individual councillor)</li> </ul> <p>A section is included on this, but not called waste stream separation – it discusses reclamation of materials, and notes this should be done ‘where possible’. References have been added in regard to suggestions that copper and steel can be reclaimed, but that re-enforced concrete is not possible.</p>

Chapters	Issues raised and Responses
Chapter 10 – Sustainable Construction	<ul style="list-style-type: none"> <li>- Whole life carbon assessments were raised by the SCC/RBBC sustainability officers (and for checklist re-embodied carbon) Whole life considered previously but rejected due to lack of control over the future choices/uses for the buildings, e.g. appliances. However, there is guidance in regard to embodied carbon and assessments.</li> <li>- RBBC sustainability officer suggested FSC and other accreditation for materials should be included. There are a number of similar schemes; it would not be plausible for planners to have detailed knowledge of all of them.</li> </ul>

### 3. Next Steps

3.1 The Council will hold a statutory public consultation on the draft SPD for a minimum of four weeks, when we will invite comments by emailing and writing to all interested parties<sup>3</sup>, and we will make the documents available on our website and in paper format in the main Town Hall and at the six libraries in the borough. The consultation is currently timetabled for March to April 2021.

3.2 Following the formal consultation stage, the draft SPD will be amended to take account of consultation responses received and any further relevant information. This Consultation Statement will also be updated with a list of who we consulted, a summary of the comments received, and how those comments have been addressed in finalising the SPD. Following its adoption, the SPD will be a material consideration used in determining planning applications and appeals.

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<sup>3</sup> Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose