

# **Climate Change & Sustainable Construction Supplementary Planning Document**

**Consultation Statement**

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

**September 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**

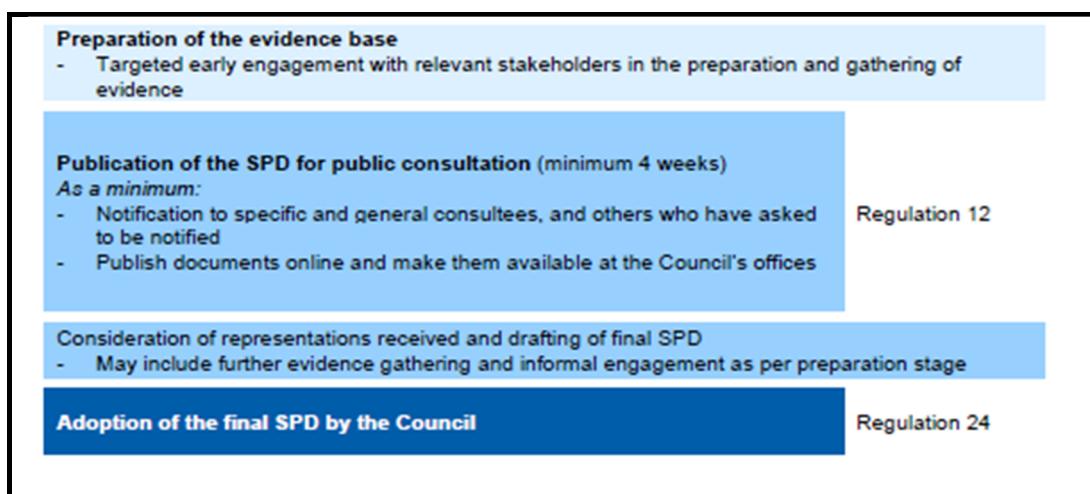
1.1. This Consultation Statement has been prepared to accompany the emerging Climate Change and Sustainable Construction SPD, and in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In line with the regulations it sets out:

- Who the Council has consulted with when preparing the SPD;
- A summary of the main issues raised; and
- How those issues have been addressed in the final revised draft of the SPD.

## 2. Preparing the SPD

- 2.1. The 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.

- 2.2. The process is summarised in Figure 1 and Table 1 below.



*Figure 1: Process of preparing an SPD*

Source – Reigate & Banstead Statement of Community Involvement (2019)

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

<sup>2</sup> Available at: [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)

*Table 1: Timeline for preparation of the SPD*

Stage	Date
Early scoping and information gathering	June 2020 – September 2020
Preparation of draft SPD, with relevant input from key individuals and organisations	September 2020 – February 2021
Consultation on draft SPD with supporting documents: Initial Consultation Statement, Strategic Environmental Assessment and Habitats Regulations Assessment	24th May 2021 – 23rd June 2021
Consideration of representations received, and review of draft SPD as relevant	June 2021 – August 2021
Adoption of the Climate Change and Sustainable Construction SPD by Council's Executive	16 September 2021
Publish SPD with final Consultation Statement and Adoption Statement	September 2021

- 2.3. In preparing the draft Climate Change and Sustainable Construction SPD for public consultation, the views and expertise of the individuals and organisations listed at Table 2 were sought, and their suggestions were considered and incorporated into re-drafting of the document as considered appropriate. Table 2: 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 2020; 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 3: 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.</li> </ul> <p>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.</p> <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>
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.</li> </ul> <p>The word 'could' has been replaced by 'should' as appropriate in the</p>

	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.
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>
Introductory (Chapters 1, 2, and 4)	<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>
Chapter 3 Location and linkages	<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</li> </ul>

	<p>design for pedestrians was important.</p> <p>Existing wording has been strengthened and further references included on safe places and active frontages.</p>
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>
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>
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) This has been included as a potential solution, but there are many situations where this would not be appropriate.</li> </ul>
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>Advise adhered to in document including additional information on the siting of PV/solar panels.</p>
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>

	Addressed in the text.
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>
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>
Chapter 6 Low-carbon power and heating	<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>

	'Whole life' carbon assessment is a specialist developing field which would be very challenging for planners to monitor at present.
Chapter 7 Green Infrastructure	<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>
Chapter 7 Green Infrastructure	<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>
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. 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.</li> </ul>
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 reinforced concrete is not possible.</p>
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)</li> </ul>

	<p>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.</p> <ul style="list-style-type: none"> <li>- RBBC sustainability officer suggested FSC and other accreditation for materials should be included.</li> </ul> <p>There are a number of similar schemes; it would not be plausible for planners to have detailed knowledge of all of them.</p>
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### 3. Public Consultation on the draft SPD

- 3.1. Following Executive committee approval on 25 March 2021 for public consultation on the draft Climate Change and Sustainable Construction SPD in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council undertook a statutory public consultation on the draft SPD between 24th May and 23rd June 2021.
- 3.2. This consultation included all interested parties<sup>3</sup>, who were contacted through email or letter, depending on the details held, and any other persons wishing to contribute via publicity at libraries and on the Council's website. The document and supporting documents were available on the website, alongside an on-line survey for respondents to complete. We also accepted emails and letters.
- 3.3. In accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 we accepted all representations received within the consultation period.

### 4. Representations Received

- 4.1. Following the formal public consultation stage, the Council has reviewed the responses received and made amendments where necessary, in line with Section 23(1) of the Planning and Compulsory Purchase Act 2004, which states that:

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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

The local planning authority may adopt a local development document (other than a development plan document) either as originally prepared or as modified to take account of:

- any representations made in relation to the document;
- any other matter they think is relevant

- 4.2 A summary of the representations received and how they have been taken into consideration in finalising the SPD is detailed in Appendix 1. In addition, regulations 11(2) and 14 of the Town and County Planning (Local Planning) (England) Regulation 2012 state that an adoption statement must be provided to clarify any modifications made.
- 4.3 Prior to finalising the necessary amendments, the summary of the responses and the Council's proposed approach/ amendments to the draft SPD were considered by the LDF Scrutiny Panel on 25 August 2021 and the Overview and Scrutiny Committee on 9 September 2021. *No major amendments were made to the SPD as a result.*

## 5. Adoption of the SPD

- 5.1. Following adoption, the Climate Change and Sustainable Construction SPD will become a material consideration in the determination of planning applications and appeals and will therefore need to be taken into consideration in the preparation of planning proposals within the borough.

## 6. Appendices

### Appendix 1: Consultation responses from specific and general consultees with resultant changes made to the SPD where relevant, and any other matters

Representor	Summary of main issues raised, per relevant chapter (Some representations are summarised.)	Council's Proposed Response	Amendments to draft SPD? (Y/N)
<b>Representation /0003 Reigate Architects</b>	General support re sustainable construction.	Welcomed.	N
<b>Representation /0003 Reigate Architects</b>	<b>Issue 1</b> Need to consider the target audience further, and the distillation of the large amount of information available - Environmental Design Pocketbook recommended.	Noted. The Council plans to prepare a slimmed-down house-holder version in the future.	N
<b>RBBC/ Representation /0004 Highways England</b>	The outcome of the consultation is unlikely to materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and MHCLG NPPF para 109) and therefore, Highways England has no further comments on the specific document.	Noted.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	Appreciate the inclusion of aerodrome safeguarding requirements already, and reference to aerodrome safeguarding circular. Sustainability - supportive/willing to work with developers to achieve safe/sustainable schemes.	Welcomed, and circular referenced to a footnote.	Y

<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 2</b> Greater clarity required re some of the figures in the document [listed].	These listed issues will all be considered case by case.	Y
<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 3</b> Delete acronyms included in Appendix which are not included in the document.	Agreed. List amended.	Y
<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 4</b> Consistency of initial capital letters on certain words or phrases, or written form of chemical names [identified] Correct the full term for SuDS to Sustainable Drainage Systems (not Sustainable Urban Drainage Systems) [instances noted].	Agreed. Terminology revised	Y
<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 5</b> Deletion required of incorrect numbering instance [noted].	Agreed. Numbering updated.	Y
<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 6</b> Provision of hyperlink to a correct and encompassing website rather than the one given [instance as suggested].	Agreed. Footnote amended.	Y
<b>RBBC/ Representation /0007 Consultee</b>	<b>Issue 7</b> Biomass - use term 'biomass energy resources'/suggestion of further amended hyperlinks/footnotes [as noted].	Agreed. Footnote amended.	Y
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	Support for the document.	Welcomed.	N

<b>RBBC/Representation /0009 Tadworth &amp; Walton Residents Association RBBC/Representation /0026 Councillor Whinney</b>	<b>Issue 8</b> Make the document more specific to readers. /Need a residents' version	Noted.	N
<b>RBBC/Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 9</b> Need to make document more mandatory - more than advisory.	SPDs can only amplify existing local plan policies. The advice they provide is not mandatory but is a material consideration in the planning decision process.	N
<b>RBBC/Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 10</b> Propose review of sustainability and climate policies in local plan.	Noted. The Council is required to review the Local Plan Core Strategy by July 2024 and the Development Management Plan by September 2024. The review would include revisiting existing climate change and sustainable development policies particularly as building regulations and environmental legislation are being amended and new requirements are being added. In autumn 2021 the government will be introducing a new planning bill which is likely to make fundamental changes to the plan making process, the content, how it is presented and implemented. It is likely that the council will follow the new approach rather than prepare a new plan based on existing legislation that would soon be superseded.	N

<b>RBBC/Representation /0010 SCC, Principal Planning Officer</b>	Document is comprehensive.	Welcomed.	N
<b>RBBC/Representation /0011 Horley Town Council</b>	Support for accountability of development re mitigation to and adaptation of CC, and other sustainability issues.	Welcomed.	N
<b>RBBC/Representation /0013 Environment Agency</b>	Support for the SPD's high design requirements.	Welcomed.	N
<b>RBBC/Representation /0015 Consultee</b>	<b>Issue 11</b> As part of the online survey it would be helpful 'to include relevant part of consultation document beside survey questions and reduce the number of links'.	Noted. Use of the survey approach was adopted to encourage greater participation in the consultation. This was the first time we tried this with a planning document. The issue is acknowledged, and solutions are being discussed. At the same time there were alternative more traditional ways to respond including email and letter.	N
<b>Chapters 1 &amp; 2</b>			
<b>RBBC/Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 12</b> Clarification required on whether the Council has joined the Net Zero pledge as other councils have done including Lancaster.	Noted. The Council decided not to join the net zero carbon pledge but through the Local Plan and Environmental Sustainability Action Plan the Council is working towards reducing carbon emissions in line with national objectives.	N
<b>RBBC/Representation /0022</b>	<b>Issue 13</b> The present terminology below gives too much room for non-compliance:	SPDs cannot introduce policy requirements. They can only provide guidance.	N

	<p>1.14 "Applicants are expected..." to be changed to "Applicants are required..."</p> <p>1.15 "Applicants are expected..." to be changed to "Applicants are required..."</p> <p>1.16 "This should be discussed..." to be changed to "This must be discussed".</p>		
<b>RBBC/ Representation /0022</b>	<p><b>Issue 14</b></p> <p>On April 20th the UK government announced that it will set the world's most ambitious climate change target into law to reduce emissions by 78% by 2035 compared to 1990 levels. This will require more rapid decarbonisation than previously expected in order to meet the sixth Carbon Budget (limits the volume of greenhouse gases emitted over a 5-year period from 2033 to 2037, taking the UK more than three-quarters of the way to reaching net zero by 2050). This urgency needs to be better reflected in Legislation paras 2.2/2.3.</p>	<p>This section can only set the legislative and policy context in a neutral manner. No change proposed.</p>	N
<b>RBBC/ Representation /0022</b>	<p><b>Issue 15</b></p> <p>2.4 Significant omission, as there is no mention of upcoming "Future Homes Standard" and how this will impact this document.</p>	<p>The Buildings Regulations consultation 2021 – Future Buildings Standard has been added: <b>'Building Regulations consultation 2021'</b></p> <p>2.23 As part of the government's commitment to achieve net zero carbon by 2050, in January 2021 the government consulted on revisions to Part L of the building regulations. Part L sets the standards for energy efficiency in new development. The proposals include a significant uplift in the required standards above the 2013 standards on which</p>	Y

		the Local Plan policies are based.'	
RBBC/ Representation /0022	<p><b>Issue 16</b></p> <p>2.9 The DMP is out of date as it refers to 2013 building regulations which have been superseded .There is industry-wide agreement that Part L is not fit for purpose and is leading to a wide performance gap; with buildings being constructed that may be using up to five times as much energy as they were intended to. This needs to be urgently addressed in Part L 2020 with design calculations needing to be far more accurate and mandatory disclosure of in-use energy performance required to encourage better building design and lower bills.</p>	<p>The Buildings Regulations consultation 2021 – Future Buildings Standard has been added: <b>'Building Regulations consultation 2021'</b></p> <p>'2.23. As part of the government's commitment to achieve net zero carbon by 2050, in January 2021 the government consulted on revisions to Part L of the building regulations. Part L sets the standards for energy efficiency in new development. The proposals include a significant uplift in the required standards above the 2013 standards on which the Local Plan policies are based.'</p>	Y

### Chapter 3: Development Location and Sustainable Transport Linkages

RBBC/ Representation /0009  Tadworth & Walton Residents Association	<p><b>Issue 17</b></p> <p>Need more detail on pedestrian/cycle routes and crossing points.</p>	Noted. The Department for Transport Cycle Infrastructure Design 1/20 and the Design Manual for Streets 2 along with the emerging Reigate and Banstead Local Cycling and Walking Infrastructure Plan provide detailed guidance. No further changes proposed.	N
RBBC/ Representation /0009  Tadworth & Walton Residents Association	<p><b>Issue 18</b></p> <p>All new development with car parking to have advance ducting and cabling for electric vehicles.</p>	Noted. This is already included at paragraph 3.18.	N
Representation /0018	<b>Issue 19</b>	The policy requirement is included at DMP Policy TAP1,	N

<b>Raven Housing Trust</b>	Paragraph 3.18 (advance provision of cabling and ducting) – notes ducting is easy/inexpensive, but questions the required provision of cabling, which is expensive and may become redundant as technology progresses re battery charging.	1f. and was subject to a development viability assessment and robust examination. Changes in technology and their roll out would inform the future local plan review.	
<b>RBBC/Representation /0011 Horley Town Council</b>	Support the framework for design of developments, re location/land use/reducing travel.	Welcomed.	N
<b>RBBC/Representation /0011 Horley Town Council</b>	Support for the planning system enabling/promoting active travel.	Welcomed.	N
<b>RBBC/Representation /0015 Consultee</b>	Electrical Vehicle charging to be included at all new builds (and car parks for flats).	Support noted. All new development attracting car travel including charging facilities is included in the draft SPD (in line with DMP Policy TAP1, 1f) at paragraph 3.17 of Chapter 3.	N
<b>RBBC/Representation /0015 Consultee</b>	<b>Issue 20</b> Larger parking spaces are needed for the EV charging.	The Development Management Plan (adopted 2019) sets car parking standards, including the size of parking spaces and requirements for EV charging infrastructure. Any review of the standards as part of a local plan review would include engagement with EV charging point suppliers and users.	N
<b>RBBC/Representation /0022</b>	<b>Issue 21</b> 3.6 All development sites should be assessed as to whether increased access by foot/bicycle can facilitate increased levels of	Understanding site permeability is highly subjective and depends on the size, shape and location of the site. The Development	N

	<p>active travel undertaken by the wider community. Permeability of sites should actively be assessed to check whether there are benefits to be sought and gained to implement the borough's Local Cycling and Walking Implementation Plan.</p>	<p>Management Plan already includes an accessibility tool which can provide an initial accessibility rating. The emerging Local Cycling and Walking Infrastructure Plan will establish the initial set of projects for detailed design. Combined these tools will help inform future investment to support active travel.</p>	
<b>RBBC/ Representation /0022</b>	<p><b>Issue 22</b> Where possible new Rights of Way should be established to enhance the present network: all unnecessary barriers to wider community movement should be avoided at all costs.</p>	<p>Whilst the principle is supported Rights of Way comes under different legislation to Planning and is subject to the Highways Authority.</p>	N
<b>RBBC/ Representation /0022</b>	<p><b>Issue 23</b> 3.15 High quality bicycle parking provision is key to increasing levels of cycle usage. The advice here is inadequate. Developers should be expected to introduce best practice cycle storage, the following document provides guidance for exemplar provision and should be adopted/signposted: <a href="https://www.cambridge.gov.uk/media/6771/cycle-parking-guide-for-new-residential-developments.pdf">https://www.cambridge.gov.uk/media/6771/cycle-parking-guide-for-new-residential-developments.pdf</a></p>	<p>Noted. Detailed guidance would require the preparation of a separate document and would include a review of existing guidance and best practice. As the SPD is intended as an introduction no changes are proposed.</p>	N
<b>RBBC/ Representation /0019</b>	<p><b>Issue 24</b> As this all applies to planning consent for new developments, greater emphasis should be put on the need to reserve the space above ground for people nature and the dwelling, and for vehicles to be stored underground.</p>	<p>Storage of vehicles below ground can be very costly which can make a development unviable. It is beyond the remit of this SPD to require below ground parking.</p>	N

<b>RBBC/ Representation /0019</b>	<b>Issue 25</b> Residential developments should have a max. vehicle speed of 20mph or lower.	Noted. This is a matter for Surrey County Council, the local highways authority. Increasing the number of 20mph areas is being proposed in the draft Surrey County Council Local Transport Plan 4 on consultation until 24 October 2021.	N
<b>Chapter 4: Carbon Reduction – Energy Hierarchy and Carbon Reduction Statements</b>			
<b>RBBC/ Representation /0009  Tadworth &amp; Walton Residents Association</b>	Carbon reduction statements - unsure of enforceability; should apply to all development.	Noted. Carbon Reduction Statements will be required for all planning applications, as set out in paragraphs 4.7 – 4.9 inclusive.	N
<b>RBBC/ Representation /0009  Tadworth &amp; Walton Residents Association</b>	<b>Issue 26</b> Construction management statements should cover all environmental issues.	Disagree. Construction Management Statements need to be proportionate for the scale and type of development proposed. The inclusion of all environmental issues would be onerous for small and modest scale developments.	N
<b>Chapter 5: Layout and Building Design (for reduced energy needs)</b>			
<b>RBBC/ Representation /0003  Reigate Architects</b>	<b>Issue 27</b> All new build to meet Passivhaus standards.	The draft SPD does not set new policy and cannot compel developers to meet Passivhaus standards specifically; it sets out a range of measures to fulfil the local plan policy/target requirements, including regarding carbon reductions.	N
<b>RBBC/ Representation /0003  Reigate Architects</b>	<b>Issue 28</b> Extensions should bring energy improvements to existing buildings (SAP calculations).	The SPD cannot introduce new policy requirements. This is subject to building regulations which are currently under review.	N

<b>RBBC/ Representation /0003 Reigate Architects</b>	<b>Issue 29</b> Include open eves for nesting birds	The Council is preparing a separate SPD for biodiversity that will be subject to future consultation. Consideration will be made on whether to include provision for nesting birds.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	Possible need to avoid south-facing habitable rooms (or to include screening) for adaptation to increased heat/need for cooling.	This issue is covered at some length within the section 5 from paragraph 5.25.	N
<b>RBBC/ Representation /0011 Horley Town Council</b>	Support for the passive and active energy measures.	Welcomed.	N
<b>RBBC/ Representation /0016 Consultee</b>	<b>Issue 30</b> Guidance is needed re the issue of new development blocking solar light from existing photovoltaic solar panels (through siting/height).	Noted. However, this is a right to light issue rather than a planning matter. Building separation distances are identified in the Development Management Plan.	N
<b>RBBC/ Representation /0015 Consultee</b>	<b>Issue 31</b> Extensions to older buildings – should be fully insulated (over a threshold size)  This should include the insulation of suspended floors of 1930s housing stock which can account for 20% heat loss.	This is a Building Regulations matter and is consequently outside the remit of this SPD.	N
<b>RBBC/ Representation /0015 Consultee</b>	<b>Issue 32</b> No mains connection to gas (as soon to be defunct - 2023).	The Government have signalled an intention to halt the installation of gas boilers in new development from 2025. However, gas connections are already becoming less common in new developments. However future occupiers still have the	N

		choice to install such connections. It is up to government to ban such connections not for this SPD.	
RBBC/ Representation /0019	<b>Issue 33</b> Intention is good; confusing usage of DER and TER, plus the concept of the Carbon Reduction Statement. Not stated what the consequences would be for the developer if the dwellings use more energy in real life than was claimed during the design stage. Should this be a binding contract, or a guarantee scheme underwritten by an insurer?	Noted. DER and TER are understood by the construction industry as the terms are embedded in the building regulations. Conditions would be applied to a planning permission and would be subject to enforcement and charges against the property. There is no expectation for it to be underwritten though some developers may take such action independently.	N

## Chapter 5: Layout and Building Design (for reduced energy needs)

RBBC/ Representation /0022	<b>Issue 34</b> Chapter 5 may need to be amended in the light of the upcoming Approved Document on overheating: changes may need to be introduced which may be critical to future-proofing domestic living environments: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953752/Draft_guidance_on_heating.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953752/Draft_guidance_on_heating.pdf</a>	Many of the themes covered in chapter 5 remain pertinent with regards to minimising overheating. Further amendments to the SPD would be subject to a review of Policy CCF1.	N
RBBC/ Representation /0022	<b>Issue 35</b> Thermal mass can potentially exacerbate night-time temperatures without active cooling if poorly designed; areas of glazing may need to be limited; external shades considered as standard; windows, balcony/patio doors etc need to be designed to allow for night-time venting whilst	Agree. However, SPD is seeking to provide guidance as to what is possible so as to minimise active cooling.	N

	maintaining security: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956037/Future_Buildings_Standard_consultation_document.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956037/Future_Buildings_Standard_consultation_document.pdf</a>		
<b>RBBC/Representation/0020 Banstead &amp; District Federation of Residents' Associations</b>	Yes – clear how it should be applied to a planning application.	Noted.	N
<b>RBBC/Representation/0027 Consultee</b>	Support proposals 5.7.	Welcomed.	N
<b>RBBC/Representation/0027 Consultee</b>	<b>Issue 36</b> Inclusion of shop fronts and their ventilation in the SPD.	Noted. We welcome these comments; however, this extends beyond the remit of the SPD but will be considered when the shop front guide is revisited.	N
<b>RBBC/Representation/0019</b>	<b>Issue 37</b> To ensure good design practice, the proposer/designer could be invited to submit a Design Statement outlining how this design constitutes an optimum solution. As for the previous comment, a binding commitment to achieve certain values can be a condition of consent being granted. Some concern w/rgds the promoting of thermal mass in designs if this is to be achieved with materials of high embodied energy (cement/concrete/brick).	Design and access statements are required to accompany a planning application. Conditions to planning permissions would be applied to ensure conformity with the policies. Noted on the concerns but it is based on currently available materials.	N
<b>RBBC/Representation/0022</b>	<b>Issue 38</b> 5.13 Thermal mass - encouraging the use of materials that add to the thermal mass of a building will add to the embodied carbon in the building. The	Noted.	N

	<p>promotion of well insulated, lighter weight buildings that are produced using modern methods of construction may lead to greater carbon savings overall.</p>		
<b>RBBC/ Representation / 0018 Raven Housing</b>	<p><b>Issue 39</b> Development in the area of "phase change materials" may be a better avenue to explore rather than continuing along the route of creating thermal mass with bricks, blocks and concrete.</p>	<p>Noted. However, this is for the developer to propose and changes to Building Regulations.</p>	N
<b>RBBC/ Representation /0022</b>	<p><b>Issue 40</b> 5.24 Controlled ventilation should be considered to be a better practise than omitting draught-stripping in kitchen doors and windows/ Not clear how this would be applied (planning application).</p>	<p>Noted. Part F of the Building Regulations is being amended. Controlled ventilation is included in the example technologies.</p>	N
<b>RBBC/ Representation /0026</b>	<p><b>Issue 41</b> Include loft insulation requirements.</p>	<p>Noted. Part L of the Building Regulations sets the standards for Energy Efficiency in buildings. These are under review and are likely to make the current requirements obsolete.</p>	N
<b>RBBC/ Representation /0026 &amp;</b>	<p><b>Issue 42</b> Proposal to require electric hobs in new developments.</p>	<p>Noted. This is already happening as developers move away from installing gas supplies. However, some homeowners will still install such supplies. A ban on gas hobs would need to come from Government and is beyond the remit of this SPD.</p>	N
<b>RBBC/Repre sentation/0027 Consultee</b>	<p><b>Issue 43</b> Paragraph 5.27 – 'Air conditioning is commonly used to address overheating, but this is energy intensive with high associated levels of carbon</p>	<p>Noted. This method has been included to the chapter.</p>	N

	<p>emissions. It also places a cost on future occupiers in terms of both energy bills and maintenance costs.</p> <p>Therefore, the Council's preferred approach to overheating is that the design of developments should follow a 'cooling hierarchy' (see Figure 11 below), subject to taking a balanced approach to this and other design considerations.</p>		
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## Chapter 6: Renewable and/or low-carbon, and local, power and heating

<b>RBBC/ Representation /0001 Consultee/ &amp; RBBC/ Representation /0027</b>	<b>Issue 44</b> Solar panels should be required as a condition.	The draft SPD does not set new policy and cannot compel developers to use solar panels specifically; it sets out a range of measures to fulfil the local plan policy/target requirements, including the use of solar panels where appropriate.	N
<b>RBBC/ Representation /0003 Reigate Architects</b>	<b>Issue 45</b> Small wind turbines not effective.	The document presents a range of options for use alone or in combination with other technologies.	N
<b>RBBC/ Representation /0003 Reigate Architects</b>	<b>Issue 46</b> Need for, or to encourage - solar/wind farms and energy from waste plants.	This SPD is concerned with the content of development applications; the need for energy from wind/solar farms/waste would form part of a wider energy strategy outside of the remit of this SPD.	N
<b>RBBC/ Representation /0003 Reigate Architects RBBC/</b>	<b>Issue 47</b> Solar panels should be used even if not attractive; sharpen the Sustainability Checklist regarding this.	The SPD seeks to amplify policy and to encourage best practice regarding climate change and other environmental issues – alongside ensuring that the	N

<b>Representation /0018 Raven Housing</b>	'6.24 and 6.25 Hiding away PV panels and requiring them to be black in colour will limit the opportunity for inclusion within a scheme.'	visual environment and sense of place are still maintained (also in line with local plan policy requirements).	
<b>RBBC/ Representations/0005 Thames Water; 0013 Environment Agency</b>	<b>Issue 48</b> Inclusion of anaerobic digestion (Thames Water), and, generally, the creation of green energy through waste-management (Environment Agency)	Agreed. The SPD largely identifies technologies that can be readily integrated into typical developments in the borough. Anaerobic digestion is now identified in paragraph 6.7. 'These types of energy sources include: connections to district heat and cooling systems or combined heat and power systems (CHP), micro-combined heat and power systems (MCHP) (set out below), some forms of thermal storage systems (see paragraph 6.48 below), and waste-management to create renewable energy, such as anaerobic digestion.'	Y
<b>RBBC/ Representation /0005 Thames Water</b>	Support for solar power.	Welcomed.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 49</b> Paragraph 6.10/CHP - concern over the impacts of the flues (protected surfaces infringement; impacts on navigational aids or instrument flight procedures; emissions) in aerodrome safeguarding.	Agree. Paragraph 6.13 additional text added: 'and aerodrome safeguarding requirements need to be taken account of regarding the height of the flue and vicinity of an aerodrome such as Gatwick Airport (in regard to impacts on navigational aids/instrument flight procedures; emissions; or protected surfaces infringement).'	Y
<b>RBBC/ Representation /0006</b>	<b>Issue 50</b> Paragraph 6.20/solar - glint/glare effects, and/or potential for	Agreed. Additional wording added at para 6.26: 'Plans for the installation of solar	Y

<b>Gatwick Airport Ltd</b>	deflecting navigational radar beams (depending on location etc), so possible need for a solar hazard study or consultation with the navigational aid providers.	panels/arrays in aerodrome safeguarding areas, should be mindful of potential impacts upon the navigational aids, or the attraction of birds, and may therefore require consultation with the airport/aerodrome, and bird-proofing measures.'	
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 51</b> Solar installations - can also attract birds, so possible need for bird-proofing, dependent on location, etc.	Agreed. Additional wording added at 6.26: 'Plans for the installation of solar panels/arrays in aerodrome safeguarding areas, should be mindful of potential impacts upon the navigational aids, or the attraction of birds, and may therefore require consultation with the Airport, or bird-proofing measures.	Y
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	Solar on green roofs (para 6.26) - safety information included is supported.	Welcomed.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	Wind turbines (paras 6.29/6.74) - safety information included is supported.	Welcomed.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 52</b> Wind turbines (paras 6.29/6.74) - needs mention of possible impacts on protected surfaces and Instrument Flight Procedures (IFP).	Agreed. Additional wording added at para 6.29 The location and size of wind turbines will also need to be controlled where they could affect air traffic control radar systems; Instrument Flight Procedures (IFP); or protected surfaces in the vicinity of aerodromes.'	Y

RBBC/ Representation /0018 Raven Housing	<p><b>Issue 53</b></p> <p>6.34 Ground source heat pumps - shared ground loop arrays which involve the installation of multiple boreholes which are linked to provide a heat source to groups of properties are not discussed. Carbon savings are possible with this approach through the reduction in the number of boreholes required for a scheme. The array can also be extended at a future date to serve additional properties plus, the infrastructure will still be available when the current buildings reach the end of their useful life.</p>	<p>Noted. The SPD introduces a wide number of basic technologies, but no other technologies are ruled out where effective carbon savings and other benefits can be achieved.</p>	N
RBBC/ Representation /0009  Tadworth & Walton Residents Association	<p><b>Issue 54</b></p> <p>Solar panels should be a requirement for all buildings unless not suitable.</p>	<p>The document does not set new policy and therefore cannot compel developers to use solar panels specifically – but it does specify requirements for carbon reductions (including through a requirement for a Carbon Reduction Statement), to be achieved through a range of suggested means, in support of local plan policies and targets.</p> <p>The section on solar panels and arrays makes clear that whilst this is a useful renewable energy source, there can be drawbacks. This technology may therefore not always be suitable for all developments.</p>	N
RBBC/ Representation /0009  Tadworth & Walton Residents Association	<p><b>Issue 55</b></p> <p>Liquid hydrogen for heating suggested.</p>	<p>Whilst we acknowledge liquid hydrogen as an emerging technology (and the wording of the document allows for and does not exclude new technologies) the Council considers that it is beyond the scope of this current planning</p>	N

		document for further amplification within the text.	
<b>RBBC/Representation/0011 Horley Town Council</b>	Support for renewable technologies.	Welcomed.	N
<b>RBBC/Representation/0022</b>	<b>Issue 56</b> 6.7/6.15 Emphasis on micro-CHP should be considered in relation to target to avoid gas for heating by 2025.	The document already identifies micro CHP along with other technologies.	N
<b>RBBC/Representation/0019</b>	<b>Issue 57</b> Biomass; very vague chapter - no mention of acceptable particulate levels, pollutants, fire safety?	Section on biomass is an introduction, pollution levels have to comply with air quality legislation and fire safety is subject to review by the fire safety officer.	N
<b>RBBC/Representation/0022</b>	<b>Issue 58</b> 6.27/6.74 Domestic wind energy installations. It would be helpful to include information regarding what is allowable under permitted development: <a href="https://www.planningportal.co.uk/info/200130/common_projects/57/wind_turbines">https://www.planningportal.co.uk/info/200130/common_projects/57/wind_turbines</a> .	Given the issues related to installing wind energy installations we would recommend a discussion with the Duty Planning Officer as mentioned in the SPD.	N
<b>RBBC/Representation/0022</b>	<b>Issue 59</b> 6.50 A sea change in the efficiency of battery storage is underway which will change the face of domestic microgeneration and should be emphasised here.	Reference to Battery systems is included in the SPD but there remain limitations in the quantity of rare earths available to meet long term demand.	N
<b>RBBC/Representation/0022</b>	<b>Issue 60</b> 6.51 Reference and encouragement should be made to the opportunities to provide community energy solutions through existing (or new) local projects e.g. <a href="https://www.weyvalleysolar.co.uk">https://www.weyvalleysolar.co.uk</a>	This is a corporate rather than a planning issue though such schemes are broadly supported in the SPD.	N

	/ (which is only one of a number of local coops organised under the umbrella of Energy4All <a href="https://energy4all.co.uk/">https://energy4all.co.uk/</a> ) These organisations are set up by local people who are willing to work with local authorities to make "offsetting" a reality.		
RBBC/Representation/0022	<p><b>Issue 61</b></p> <p>6.52 Biomass. This is an important renewable energy source, which supports local rural industry. Given that Surrey is the most heavily wooded county in the UK, with more trees planned this section should be given greater consideration. The Government supports biomass combustion, particularly in heating large buildings to continue to be utilised in the decarbonisation of heating whilst also mitigating the air quality impacts.</p> <p>There is an overemphasis on logs. The use of woodchip and pellets should be referenced as an alternative. Local projects exist which are very good examples of local self-sufficiency.</p>	The SPD provides guidance on Biomass. However there remain issues on removing trees to burn them, which contributes to air pollution when they could be absorbing carbon from the atmosphere.	N
RBBC/Representation/0007 Consultee	<p><b>Issue 62</b></p> <p>Air Quality - should include policy guidance, including link to RBBC's Environmental Protection statements on Smoke Control Area &amp; Smokeless Fuels.</p>	Agreed. Link included at para 6.54.	Y
RBBC/Representation/0019	<p><b>Issue 63</b></p> <p>Requirement 6.60: why? Is this not for the designer to propose?</p>	Generally recognised as best practice.	N

RBBC/ Representation /0019	<p><b>Issue 64</b></p> <p>Paragraph 6.70 – ‘Why limit the size of the housing [compressor unit] to 0.6m.cu? No mention of noise from ASHP? Acceptable max. db-level? Why are Air-conditioning units not included?’</p>	<p>Noted. The size limit of 0.6m.cu is permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 Schedule 2 Part 14 Class G. Larger units would require planning permission. Air conditioning units were not considered a low carbon technology.</p>	N
RBBC/ Representation /0022	<p><b>Issue 65</b></p> <p>6.74 Insufficient detail to advise and support proposals for medium and larger scale wind. A constraints map could be provided which shows airport safeguarding, as well as landscape designation (AONB). Wind speed maps would help identify opportunities.</p>	<p>The object of this guidance is to support typical developments not to provide detailed guidance for all eventualities which could soon become obsolete. Airport safeguarding maps are already available as too are wind speed maps from various providers. The AONB is shown on the Local Plan Policies Map.</p>	N
RBBC/ Representation /0022	<p><b>‘Community Energy. A separate paragraph supporting the opportunities for local communities to get involved in engaging with the climate emergency would be welcome. These opportunities may arise as a result of new development (engaging new residents as well as those already living in the locality): <a href="https://energy4all.co.uk/about-us/">https://energy4all.co.uk/about-us/</a></b></p>	<p>There are many initiatives supporting community energy but these are better placed outside this SPD as they are more about groups working together rather than individual developments which this SPD is primarily concerned with.</p>	N
<p><b>Chapter 7: Green Infrastructure and ecology for reduced energy needs and efficiencies, and climate adaptation</b></p>			
RBBC/	Much support with regard green infrastructure and greening of	Welcomed.	N

<b>Representation /0013 Environment Agency</b>	development sites, including via living roofs, and the inclusion of green infrastructure for resilience, flood-risk mitigation, and improved habitats.		
<b>RBBC/ Representation /0013 Environment Agency</b>	<p><b>Issue 66</b></p> <p>Urban Blue Corridors represent a new way of thinking about opportunities and solutions to urban flood risk management and can be applied at the strategic as well as at a Master-planning site-specific scale. It should be highlighted that a potential benefit or design element of green infrastructure is the provision of increased flood storage that can link with the enhancement of biodiversity as well as economic benefits.</p>	<p>Agreed. New paragraph added at 7.31 stating: 'The Environment Agency are promoting Urban Blue Corridors. These represent a new way of thinking about opportunities and solutions to urban flood risk management and can be applied at the strategic as well as at a Master-planning site-specific scale. It should be highlighted that a potential benefit or design element of green infrastructure is the provision of increased flood storage that can link with the enhancement of biodiversity as well as economic benefits.'</p>	Y
<b>RBBC/ Representation /0013 Environment Agency</b>	<p><b>Issue 67</b></p> <p>Green infrastructure also contributes to the reduction of water pollution, by exploiting the natural processes of sedimentation, filtration and biodegradation to remove pollutants. Increased surface permeability may also make a small contribution to recharge of groundwater supplies, helping to maintain water levels over the year and reduce the risk of drought over the summer months.</p>	<p>Agreed. New paragraph added at 7.32 stating: 'Green infrastructure also contributes to the reduction of water pollution, by exploiting the natural processes of sedimentation, filtration and biodegradation to remove pollutants. Increased surface permeability may also make a small contribution to recharge of groundwater supplies, helping to maintain water levels over the year and reduce the risk of drought over the summer months.'</p>	Y
<b>RBBC/ Representation /0025 Natural England</b>	Welcome the inclusion of Natural England's Climate Change Adaptation Manual 2 <sup>nd</sup> Edition (2020) is being referenced within the document.	Noted.	N

<b>RBBC/ Representation /0025 Natural England</b>	Support inclusion of Chapter 7 as it expands on a number of key areas that should be considered within any new development in future and which will help to address the issue of climate change.	Noted.	N
<b>RBBC/ Representation /0003 Reigate Architects</b>	<b>Issue 68</b> Green roofs should be required for petrol stations.	The draft SPD sets out a range of measures for improved environmental outcomes relating to targets and requirements set in policy, but it would be outside its remit to specify green roofs for any one type of development.	N
<b>RBBC/Repre sentation/0027 Consultee</b>	Support the inclusion of trees for shade in chapter 7.	Welcomed.	N
<b>RBBC/Repre sentation/0027 Consultee</b>	<b>Issue 69</b> Concern regarding 'frigid' shade and wind tunnel effects from buildings.	Noted. This is a design consideration and can be partially avoided by the use of canopies to reduce effects of wind.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 70</b> Concern over flocking birds (need for safety requirements) where fruit/berry species are included in landscaping schemes, and Corvids/Pigeons where there is concentrated tree-planting.	Agreed. Paragraph 7.45 of the draft SPD does include a requirement for care to be taken regarding this in the south of the borough close to the airport. However additional wording has been added to this regarding species and trees (and bird-attraction) as noted in the representation. Para now reads: '7.45 In the south of the borough close to the Gatwick flightpath careful consideration will be required where open water or certain types of green roofs/infrastructure, or tree-planting (which can attract Corvids and pigeons) are incorporated into the scheme as this could attract birds and	Y

		in so doing increase the risk of bird strikes. Where fruit/berry species are included, consideration should be had in regard to flocking birds. Nonetheless, most green roofs attract smaller birds that are lower risk to aircraft and, as such, a careful judgement needs to be made.'	
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 71</b> Paragraph 7.45 (green roofs/water bodies) - Support current inclusion of safeguards re bird attractions and Gatwick flightpath.	Welcomed.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<b>Issue 72</b> Would like the reference in this paragraph widened out to 13km from the airport (with impacts dependent upon scale of roofs/water bodies and distance from airport).	With regard to green roofs we consider that widening out the area to 13km is unreasonable as it crosses into other districts and boroughs and would be unnecessary as ecological advice from Surrey Wildlife Trust suggests the birds attracted to green roofs are too small for bird-strikes.	N
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	Green walls, bat and bird boxes, and hibernaculas are not an issue - attract smaller species, etc.	Noted.	N
<b>RBBC/ Representation /0008 Surrey Wildlife Trust &amp; RBBC/ Representation /0019</b>	<b>Issue 73</b> Green roofs (paragraphs 6.26/7.45) - Issue of incompatibility with Gatwick's flightpath is over-played as bird-strike normally involves larger birds not attracted to green roofs.	Agreed. Although this is a balance between the advice of Gatwick safety representatives, and ecological advice regarding risk. Therefore, para 7.45 adjusted to reflect both and to require a sensible judgement. 'In the south of the borough close to the Gatwick flightpath careful consideration will be required where open water or certain types of green	Y

		roofs/infrastructure, or tree-planting (which can attract Corvids and pigeons) are incorporated into the scheme as this could attract birds and in so doing increase the risk of bird strikes. Where fruit/berry species are included, consideration should be had in regard to flocking birds. Nonetheless, most green roofs attract smaller birds that are lower risk to aircraft and, as such, a careful judgement needs to be made.'	
<b>RBBC/ Representation /0008 Surrey Wildlife Trust</b>	<b>Issue 74</b> Paragraphs 7.8/7.9 - Incorrect tree species listed as per local and native Paragraph 7.13 - Further incorrect/unsuitable tree references, included as suitable near car parks More local experience/intuition should be reflected in the list.	Agreed. The text has been amended to include the correct species, and local expertise.	Y
<b>RBBC/ Representation /0008 Surrey Wildlife Trust</b>	<b>Issue 75</b> Paragraph 7.12 - Clarification needed re meaning of 'animal' - re shading for animals (i.e. pets or other).	Agreed. Clarification has been included in the text.	Y
<b>RBBC/ Representation /0008 Surrey Wildlife Trust</b>	For general information regarding trees for Climate Change mitigation, see info - Surrey Nature Partnership position statement [link provided].	Noted.	N
<b>RBBC/ Representation /0008 Surrey Wildlife Trust</b>	<b>Issue 76</b> Paragraph 7.17 (wildlife habitats) - supports inclusion of reference to living walls/pillars/roofs, but notes these can't recreate whole ecosystems as seems to be suggested (needs re-wording).	Agreed. Wording has been amended to; 'The creation of habitats for nature can be provided through measures such as 'living' walls and roofs on buildings, as well as providing green usable spaces and improved air	Y

		quality. Maintenance should be very carefully considered and designed into schemes for living pillars.'	
<b>RBBC/Representation/0022</b>	<p><b>Issue 77</b></p> <p>7.17/18 Specific measures to support certain endangered species should be highlighted/introduced.</p> <p>Examples are:</p> <p>Swifts:  <a href="https://www.barratdevelopments.co.uk/media/media-releases/pr-2016/pr-02-09-2016">https://www.barratdevelopments.co.uk/media/media-releases/pr-2016/pr-02-09-2016</a></p> <p>Hedgehogs:  <a href="https://www.hedgehogstreet.org/development/">https://www.hedgehogstreet.org/development/</a></p> <p>Bats:  <a href="https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes">https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes</a></p>	Noted. A separate Biodiversity SPD is being prepared by the Council where such matters will be addressed.	N
<b>RBBC/Representation/0008 Surrey Wildlife Trust</b>	<p><b>Issue 78</b></p> <p>Para 7.30 - needs re-word per present, not future, tense re impacts of climate change of on species and habitats.</p>	The text at paragraph 7.30 already reflects current trends and pressures, whilst also looking ahead.	N
<b>RBBC/Representation/0008 Surrey Wildlife Trust</b>	<p><b>Issue 79</b></p> <p>Paragraph 7.38 - sense-check needed.</p>	Agreed Minor changes to 7.30: 'Flora and fauna may also be susceptible to changes in climate, and there is evidence that this is happening as a result of the rapid drying-out of wetlands, heathlands, and aquatic areas <sup>4</sup> '.	Y

<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 80</b> A permission should be required for all felling of trees over a certain size (perhaps Article 4).	This is outside the scope of this SPD but is managed through the use of Tree Preservation Orders. No change proposed.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 81</b> Need for an update of TPO register/monitoring (and enforced).	Noted. This is outside the scope of this SPD.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 82</b> Need for monitoring of tree-planting conditions.	Noted. Officers already check such conditions where resourcing allows.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 83</b> Need for deep enough foundations to avoid subsidence close to trees, especially on clay.	Noted. Such matters are covered through building regulations.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<b>Issue 84</b> A conflict noted: higher densities to save green/agricultural land, but having garden space to plant trees.	Noted – the need for green space/trees in residential areas, whilst making best use of land, and providing additional homes, is a wider issue for planning policy to address.	N
<b>RBBC/ Representation /0009 Tadworth &amp; Walton</b>	<b>Issue 85</b> Note Government statement - all new estate roads should include tree-planting - developers need to provide sufficiently wide	Noted. National Planning Policy Framework 2021 has been amended.	N

<b>Residents Association</b>	roads/verges, with tree-planting at close intervals.		
<b>RBBC/Representation /0011 Horley Town Council</b>	Support protection of landscape and biodiversity, and GI measures.	Welcomed.	N
<b>RBBC/Representation/0027 Consultee</b>	<b>Issue 86</b> Detailed designs can be assessed at Planning Application stage, but unless the concept is embedded at pre-application stages, and made clear to the developer, I assume that the design result cannot be controlled. Are you able to say whether R and B practice allows for such a dialogue? Does the council have the skills in house to assess the quality of a landscape design submission?	There is a pre-application process where such elements are discussed. The sustainability checklist contained in this SPD will form part of the discussions.	N
<b>RBBC/Representation/0027 Consultee</b>	<b>Issue 87</b> Could you require the applicant to reduce hard surfaced areas and get them to provide more soft landscaping? A typical example are the "Self storage facilities" and some supermarkets which seem to get planning permission in many UK towns without a requirement for trees in the car parks.	The SPD addresses requirements for soft landscaping and green infrastructure, and this is to amplify the requirements in DMP policies NHE4 and OSR2.	N
<b>RBBC/Representation/0027 Consultee</b>	<b>Issue 88</b> Concerns re felling of trees/ requirement for Tree Preservation Orders.	Noted. Tree preservation Orders are considered separately but retention of trees can form a condition with a planning application.	N
<b>RBBC/Representation/0027 Consultee</b>	<b>Issue 89</b> (a) The expansion of hardsurfaced areas in the countryside on farms and in other land areas (eg "horseyculture") and in land	Noted. There is some use of GIS and mapping systems to monitor the situation.	N

	<p>belonging to sports clubs, and private owners, without planning permission, for parking, storage of scaffolding, containers and the like, seems to be a constant and possibly increasing problem. As far as I am aware, such hardcore or gravelled or tarmacked / block paved areas are all deemed "engineering works" requiring planning permission. They tend to happen incrementally, over years in rural settings locally. This has an effect on climate change, changing the landscape from green to grey.</p> <p>Does Planning regularly monitor the borough via aerial photos (Google Satellite or Earth view) to look out for new areas, and expansion, and do you take enforcement action to stop them?'</p>		
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## Chapter 8: Water Resources

<b>RBBC/ Representations/0005 Thames Water; 0013 Environment Agency</b>	<p><b>Issue 90</b> The Environment Agency has designated Thames Water region as 'seriously water stressed', with future pressures: population growth/climate change.</p>	Agreed. Additional text to para 8.2: 'the Environment Agency has designated the Thames Water region, and the general area that encompasses Reigate & Banstead Borough, as 'seriously water stressed', and has identified the futures pressures of development and climate change. The Reigate & Banstead area is noted by the EA as having limited capacity for new development or abstraction.'	Y
<b>RBBC/ Representations/0005 Thames Water</b>	Support for the chapter.	Welcomed.	N

<b>RBBC/ Representation /0005 Thames Water</b>	Support for the water-consumption target of 110 litres per head, per day (for all residential permissions).	Welcomed.	N
<b>RBBC/ Representation /0013 Environment Agency</b>	Need for optimising of existing resources/development with highest level of water efficiency and stringent water-consumption targets	The document addresses these issues and incorporates water-efficiency standards (within the parameters of existing Local Plan policy).	N
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 91</b> Should also include the 105 litres per head per day plus 5 for gardens as per NPPG.	Agreed. This target has been included as an additional (non-binding) footnote 109 in regard to the NPPG. However, this target is not included within our policies, so cannot be required.	Y
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 92</b> BREEAM water efficiency standards for non-domestic re-developments.	Agreed. These standards have been referenced, as Core Strategy Policy CS11 requires all non-residential development to meet BREEAM 'very good'. Para 8.6 states: 'Developers will be required to meet the BREEAM standards for water-efficiency for all non-residential developments <sup>5</sup> '.	Y
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 93</b> Issues regarding sewer flooding away from flood-plains - therefore developers to include proper drainage to avoid draining to sewers.	Agreed. The draft SPD does include text regarding gutters/pipes suitable for heavy rainfall events, and requirements for permeable surfaces to allow water to soak away, and the issue is addressed re planning applications at 8.15 of the draft SPD. However, reference has been added to the main text, regarding	Y

<sup>5</sup> As per the requirements of Policy CS11 (1,b) that all non-residential development should meet BREEAM standard 'very good'.

		suitable drainage to avoid overwhelming sewers.	
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 94</b> Importance/general benefits of SuDS for limiting water drainage to the sewer networks, and for water quality; benefits to landscape and wildlife; and for amenity...	Agreed. The SPD does relate flood-risk and the implementation of SuDS and addresses the benefits of SuDS for this and other issues under the planning applications section in the draft at 8.15.  Para 8.14 amended to; ‘Suitable drainage, for additional rainfall will need, and for prevention of sewer flooding elsewhere, will to have been considered.’	Y
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 95</b> Include reference to Lead Local Flood Authority (LLFA) to confirm suitability of SuDS	Agreed. Following text included at 8.16: ‘The lead local flood authority (LLFA) should confirm the suitability of any SuDS schemes presented as part of schemes.’	Y
<b>RBBC/ Representation /0005 Thames Water</b>	<b>Issue 96</b> Provision of a statement on how the water standard will be achieved should be provided.	Noted. The draft SPD contains this requirement at paragraph 8.14, regarding planning applications.	N
<b>RBBC/ Representation /0013 Environment Agency</b>	<b>Issue 97</b> Recommend inclusion of reference to the Water Framework Directive (WFD) objectives. They also noted the multiple benefits of holistic water management interventions, including reducing flood-risk.	Agreed. Text added to 7.27: The government’s Environment Plan (2018) <sup>6</sup> promotes a move toward natural flood-risk management. This is rooted in the Water Framework Directive which seeks to prevent deterioration of the water environment and improve water quality by	Y

<sup>6</sup>

<https://www.gov.uk/government/publications/25-year-environment-plan>

		managing water in natural river basin districts.	
<b>RBBC/ Representation /0013 Environment Agency</b>	The River Mole partnership is jointly hosted by the Surrey Wildlife Trust and The South East Rivers Trust. The steering group includes the Environment Agency, Natural England, Surrey County Council, district councils, Countryside Partnerships, Thames Water, Sutton and East Surrey Water and Sussex Wildlife Trust. The wider partnership is made up of a number of interested organisations, local community groups and landowners.	Noted.	N
<b>Representation /0013 Environment Agency</b>	<p><b>Contribution to environmental outcomes for 2021</b></p> <ul style="list-style-type: none"> <li>• Greater fish passage on the lower section of the Pipp Brook, a tributary of the Mole, funded by the Catchment Partnership Action Fund will improve the fish status of the water body.</li> <li>• East Surrey Rivers Project includes a series of tasks on the Redhill Brook to improve fish passage and habitat. This is funded by the Environment Agency.</li> <li>• Creation of wetland habitat at Ashtead Rye Meadows to improve habitat diversity and flood protection</li> </ul>	Noted.	N
<b>Representation /0013 Environment Agency</b>	<p><b>Groundwater contamination</b></p> <p>It is recommended that the requirements of the National Planning Policy Framework (NPPF) are followed. Paragraph 170 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing</p>	Noted.	N

	<p>development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels water pollution. Therefore, in completing any site investigations and risk assessments the masterplan should assess the risk to groundwater and surface waters from contamination which may be present and where necessary propose appropriate remediation.</p> <p>Provisions for both foul and surface water drainage should also be considered at an early stage to insure suitability/acceptability of proposals. Proposals must ensure overlapping issues with regard to contamination and drainage are properly understood in design and constraints for the development and topics are not addressed in isolation.</p>		
<b>Representation /0013 Environment Agency</b>	<p><b>Issue 98</b></p> <p>We recommend that the SPD:</p> <ul style="list-style-type: none"> <li>•Refers to the Environment Agency Land Contamination: Risk Assessment guidance, which is based on the Model Procedures for the Management of Land Contamination (CLR 11). Now known as Land Contamination Risk Management (LCRM);</li> <li>•Uses BS 10175:2011+A2:2017, Investigation of potentially contaminated sites – Code of Practice as a guide to undertaking the desk study and site investigation scheme;</li> <li>•Uses MCERTS accredited methods for testing</li> </ul>	<p>Noted. It is considered that this recommendation is going beyond the remit of the SPD and would need to be taken into consideration for the next local plan review.</p>	N

	contaminated soils at the identified sites.		
<b>Representation /0013 Environment Agency</b>	<p><b>Issue 99</b>  Include link to EA Guidance for developers:  <a href="https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals">https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals</a></p>	Agreed. Text inserted into para 7.31: Further advice for developers from the Environment Agency can be found at: <a href="https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals">https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals.</a>	Y
<b>RBBC/ Representation /0006 Gatwick Airport Ltd</b>	<p><b>Issue 100</b>  Paragraph 8.15 (SuDS) – need for inclusion of aerodrome safeguarding information in relation to SuDS and bird attraction.</p>	Agreed. Following text added: ‘However all SuDS schemes in the proximity of an aerodrome, and in particular Gatwick Airport, should be carefully designed with regard to the risk of attracting birds, and bird-strike risk for aviation.’	Y
<b>RBBC/ Representation /0009 Tadworth &amp; Walton Residents Association</b>	<p><b>Issue 101</b>  Mandatory water metering should be included.</p>	This SPD can only expand upon existing Local Plan policy. As Reigate and Banstead Borough has been designated as a high water stress area under the terms of the Water Act 1991, the water companies already have powers to compulsorily require water meters on all properties.	N
<b>RBBC/ Representation /0011 Horley Town Council</b>	Support for efficient use of water.	Welcomed.	N
<b>RBBC/ Representation /0011 Horley Town Council</b>	Support flood mitigation measures.	Welcomed.	N

<b>RBBC/Representation/0020 Banstead &amp; District Federation of Residents' Associations &amp; RBBC/Representation/0017</b>	<p><b>Issue 102</b></p> <p>Para 8.8 Grey water is not advisable for use in the garden if, as in the case of bath water, additives such as bath salts, oils or bubbles have been added to the water.</p>	<p>Noted. Footnote and clarification added.</p> <p>The Royal Horticulture Society advice (at <a href="https://www.rhs.org.uk/science/gardening-in-a-changing-world/water-use-in-gardens/using-grey-water">https://www.rhs.org.uk/science/gardening-in-a-changing-world/water-use-in-gardens/using-grey-water</a>) is 'Plants can be watered with shower, bath, kitchen and washing machine water (from rinse cycles), collectively referred to as 'grey' water. It varies in quality and may contain contaminants such as soap and detergent. Fortunately, soil and potting compost are effective at filtering them out, and the residues can sometimes act as a mild fertilizer.'</p>	Y
<b>RBBC/Representation/0019</b>	<p><b>Issue 103</b></p> <p>Block Paving being installed in the existing housing &amp; commercial building stock should require planning consent and be signed off by a building inspector. Provision should be made for either capture or soakaway. Proof of completion required when properties are sold.</p>	<p>Permeability of paving as part of a new development is already subject to building regulations and inspection. There are already existing building regulations with regard to site drainage.</p>	N
<b>RBBC/Representation/0019</b>	<p><b>Issue 104</b></p> <p>Capture and storage of rainwater should be a requirement for all new developments, as should be the inclusion in the build of grey water circuits to toilets, outside taps and washing machines.</p>	<p>Policy CCF 1 sets the amount of water that can be used per home per day. How this is achieved is subject to the applicant and local site conditions. Compulsory application would require changes in the Building Regulations.</p>	N

RBBC/Representation/0018 Raven Housing	<p><b>Issue 105</b></p> <p>Include mention on how off-site, modern methods of construction can significantly reduce the amount of water used in construction.</p>	<p>Noted. Additional wording added: '10.22 Construction companies working in the borough are encouraged to follow best practice or preferably become registered in such schemes. Modern forms of prefabricated construction are supported as they can be a highly efficient way of construction, consume less water, facilitate the reduction of embodied carbon and can reduce carbon emissions.'</p>	Y
<b>Chapter 9</b>			
RBBC/ Representation/ 0008 <b>Surrey Wildlife Trust</b>	<p><b>Issue 106</b></p> <p>Paragraph 9.8 - Retrofit for energy efficiency can cause problems for 'synanthropic' wildlife through elimination of building features used by this sort of wildlife (such as roof-nesting birds and roosting bats) - need for the use of bespoke bricks/other structures in the built environment therefore (also for new build).</p>	<p>This matter is more relevant for consideration in a separate SPD on biodiversity currently being prepared.</p>	N
RBBC/ Representation/ 0009 <b>Tadworth &amp; Walton Residents Association</b>	<p><b>Issue 107</b></p> <p>Greater flexibility in conservation areas/listed buildings needed (without harm to the character of the areas).</p>	<p>The document does attempt to balance the need for environmental improvements with the protection of the historic environment, hence the inclusion of Chapter 9, which has been prepared with the conservation officer.</p>	N
RBBC/ Representation/ 0010 <b>SCC, Principal Planning Officer</b>	<p><b>Issue 108</b></p> <p>Embodyed carbon/not-demolishing - more sustainable (discussed as chapter 10) - Can include this principle to the historic buildings section.</p>	<p>This principle (restoration and re-use) is included within the general sustainable construction section (Chapter 10, which includes significant coverage of the re-use of materials and buildings) and therefore does not need to be included in this section,</p>	N

		whose aim is to understand how historic assets can be preserved/improved regarding energy-efficiency anyway, albeit in a sensitive manner.	
<b>RBBC/ Representation /0010 SCC, Principal Planning Officer</b>	<b>Issue 109</b> Need to be mindful of the setting of designated sites/monuments regarding wind turbines/solar panels banks - need for heritage statements and HE/SCC (Historic Environment Planning), etc consultations, for larger proposals.	Agreed. Following text included at 9.20: 'For larger proposals, including solar arrays and wind turbines, it may be necessary to consult Historic England and/or SCC Historic Environment Planning and provide a heritage statement. Permission may also be required for the installation of other types of renewables, including external facilities for air source heat pumps.'	Y
<b>RBBC/ Representation /0010 SCC, Principal Planning Officer</b>	<b>Issue 110</b> Any works that involve ground disturbance that occur within designated Areas of High Archaeological Potential would require a formal permission.	Agreed. Following text added to 9.21: 'Within a designated Area of High Archaeological Potential (AHAP), any ground disturbance caused by renewable technologies would require a formal permission.'	Y
<b>RBBC/ Representation /0012 Historic England</b>	Historic England's has no specific comments to make on the SPD as it deals with matters largely beyond its remit. Links supplied to research papers on the historic environment and climate change.	Noted. These papers were used to inform the chapter.	N
<b>Chapter 10: Sustainable Construction</b>			
<b>RBBC/ Representation</b>	<b>Potential for the inclusion of advice regarding modern</b>	Whilst modern methods of construction have been	Y

/0018 Raven Housing	<b>methods of construction to reduce embodied carbon.</b>	included in 10.18 and Footnote 116 and the RICS paper on the subject has been added further advice is considered to be going beyond the introduction this SPD provides.	
RBBC/ Representation /0003 Reigate Architects	<b>Issue 111</b> Need to make a stronger point regarding the re-use of buildings before replacement (energy used during demolition).	The SPD does include a recommendation for recycling of buildings where possible, but this should not be strengthened further, given that it is not always appropriate. Some buildings contain materials that have reached the end of their designed purpose.	N
RBBC/ Representation /0006 Gatwick Airport Ltd	<b>Issue 112</b> Construction Management (paragraph 10.25) - issues noted in regard to crane heights/further info.	Issues in respect of crane heights and other construction management areas, in relation to aerodrome safeguarding are outside the remit of this SPD, which is to amplify policy in regard to climate/sustainability issues.	N
RBBC/ Representation /0010 SCC, Principal Planning Officer	Support for the principles of embodied energy (principle of avoiding demolition).	Welcomed.	N
Representation /0013 Environment Agency	<b>Issue 113</b> Waste planning has a role to play in delivering objectives including reducing greenhouse gas emissions, the better management of resources and protecting the environment. Waste planning can also contribute to wider economic development and growth. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a	Noted. Surrey County Council are preparing a new Minerals and Waste Plan which will inform the future Local Plan review	N

	legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact.		
<b>RBBC/Representation /0010 SCC, Principal Planning Officer</b>	Support references to SCC waste plan.	Welcomed.	N
<b>RBBC/Representation /0010 SCC, Principal Planning Officer</b>	<b>Issue 114</b> Would like reference to Surrey Minerals Plan.	Agreed. Additional text on the Surrey Minerals Plan 2011 and its role in sustainable development has been added to Chapter 2.	Y
<b>RBBC/Representation /0011 Horley Town Council</b>	Support waste reduction measures.	Welcomed.	N
<b>RBBC/Representation/0020 Banstead &amp; District Federation of Residents' Associations</b>	Support for proposals.	Welcomed.	N
<b>RBBC/Representation/0022</b>	<b>Issue 115</b> 10.9 - Presently only mentions demolition of existing buildings. Paragraph needs to also encourage a closed loop building approach where buildings are designed for disassembly/deconstruction and reuse.	Whilst this is a sensible proposal, such examples are extremely rare, and the SPD is seeking to respond to current circumstances.	N
<b>RBBC/Representation/0018 Raven Housing</b>	<b>Issue 116</b> 10.16 Reducing embodied carbon. Align focus with that of	This goes beyond the remit of this SPD as it is limited to existing planning policies.	N

	the Committee on Climate Change report (Feb 2019).		
RBBC/Representation/0019	<p><b>Issue 117</b>  An estimate of embodied carbon for new developments should be submitted as part of the design proposal, including all materials used for the build, including waste disposed of.</p> <p>This should be judged against an energy consumption projection for the buildings in use, as well as their projected life span &amp; maintenance requirement (much as you would do for buying a car).</p>	<p>During the preparation of the SPD, the issue of embodied carbon was carefully considered. It was concluded that extensive specialist knowledge was needed which is limited at present particularly if the entire product lifecycle, including transport, disposal and the building's lifespan was considered. We consider this is an area government should lead on.</p>	N
RBBC/Representation/0022	<p><b>Issue 118</b>  10.22 Typo?</p>	Repaired.	Y
RBBC/Representation/0014	<p><b>Issue 119</b>  Inclusion of swift bricks or houses should be considered.</p>	<p>Noted. These types of measures will be considered for inclusion in the Council's forthcoming Biodiversity SPD, which is currently being prepared.</p>	N
RBBC/Representation/0017	As far as I am concerned the proposals are good. Those with more expertise might feel further specialist advice is needed.	Noted.	N
RBBC/Representation/0009 Tadworth & Walton Residents Association	<p><b>Issue 120</b>  Mention should be made to fire risk and avoiding the use of flammable materials as they can release CO2 emissions and other dangerous pollutants.</p>	<p>Noted. Separate Fire Statements are now required with larger planning applications.</p>	N
<b>Sustainability Checklist</b>			
RBBC/Representation/0009	<p><b>Issue 121</b>  The Sustainability Checklist - should accompany all planning applications.</p>	<p>Agreed. The Checklist will be required to be completed as part of the Development Control validation process.</p>	N

Tadworth & Walton Residents Association			
<b>Other</b>			
RBBC/Representation /0003 Reigate Architects	<b>Issue 122</b> Sustainable masterplans should be produced for all important sites, with development compliance.	This is beyond the remit of this SPD. Large-scale developments are normally subject to Master planning and Environmental Impact Assessments.	N
RBBC/Representation /0003 Reigate Architects	<b>Issue 123</b> Need for resources/re-cycle centres.	Provision of resources, including recycling centres, is beyond of the remit of this SPD, and is part of minerals and waste planning.	N
RBBC/Representation /0006 Gatwick Airport Ltd	Further References suggested including: Airport Operators Association (AOA) Advice Note 5 'Renewable Energy & Impacts on Aviation', available at <a href="https://www.aoa.org.uk/policy-campaigns/operations-safety/">https://www.aoa.org.uk/policy-campaigns/operations-safety/</a>  Airport Operators Association (AOA) Advice Note 3 'Wildlife Hazards Around Aerodromes', available at <a href="https://www.aoa.org.uk/policy-campaigns/operations-safety/">https://www.aoa.org.uk/policy-campaigns/operations-safety/</a>  and 'Guidance to Crane users on Aviation Lighting & Notifications' available at <a href="http://www.caa.co.uk">www.caa.co.uk</a>	Noted. First two references included as footnotes. The Noted. Crane advice is considered beyond the remit of this SPD.	Y
RBBC/Representation /0009 Tadworth & Walton Residents Association	<b>Issue 124</b> Need for local targets, e.g. for noise/pollution.	This document can only enhance/provide guidance for existing local plan policy. It cannot set new targets.	N

<b>RBBC/ Representation /0017 Consultee</b>	<b>Issue 125</b> Concern about carbon emissions, increased energy needs and environmental impacts of proposed crematorium in the borough, the consideration of alternative green options and the approach the council has adopted.	The planning application for the crematorium is a matter for Development Management based upon existing policy and material considerations. The outcome of that application is outside the remit of this SPD consultation.	N
<b>RBBC/ Representation /0021 Consultee</b>	No comments.	Noted.	N
<b>RBBC/ Representation /0023 Consultee West Sussex</b>	No comments.	Noted.	N
<b>RBBC/ Representation /0024 Consultee Transport for London</b>	No comments.	Noted.	N
<b>RBBC/ Representation /0002 Exolum Pipeline System Ltd</b>	Pipeline diagram supplied.	Noted.	N

## Appendix 2: Individuals and organisations consulted on the draft Local Character and Distinctiveness Design Guide SPD under Regulations 12 and 13

Specific Consultees	Specific Consultees
(aq) Limited	Marine Management Organisation

<b>Specific Consultees</b>	<b>Specific Consultees</b>
Adur & Worthing Councils	Mayor of London (Senior Strategic Planner)
Affiniti Integrated Solutions Limited	Mid Sussex District Council
Airband Community Internet Limited	MLL Telecom Ltd
Airwave Solutions Limited	Mobile Broadband Network Limited
Aqua Comms	Mole Valley District Council
Arqiva Communications Ltd	Mono Consultants
Arqiva Limited	MS3 Networks Ltd
Arqiva Services Limited	My Fibre Limited
Arun District Council	National Grid (Avison Young)
AT&T Global Network Services (UK) B.V.	NATS (En Route) PLC
Atlas Communications NI Limited	Natural England
Atlas Tower Group Limited	Natural England Sussex & Surrey Team
B4B Networks Ltd	Neos Networks Ltd
Betchworth Parish Council	Network Rail (town planning)
Bletchingley Parish Council	Newdigate Parish Council
Bolt Pro Tem Limited	NextGenAccess Ltd.
Boundless Networks Ltd	NHS Crawley Clinical Commissioning Group (CCG)
Box Broadband Limited	NHS England

<b>Specific Consultees</b>	<b>Specific Consultees</b>
Brighton & Hove City Council	NHS England and NHS Improvement South East
Britaniacrest Recycling	NHS Property Services
Britannia Towers II Ltd	Nutfield Parish Council
British Gas	NWP Street Ltd
British Telecom	Office of Rail and Road
British Telecommunications plc	Open Fibre Networks Limited (formerly Independent Next Generation Networks Limited)
Broadband for the Rural North Limited	Open Network Systems Limited
Broadway Partners Limited	Orange Personal Communication Services Ltd
Buckland Parish Council	Outwood Parish Council
Burstow Parish Council	PCCW Global Networks (UK) Plc
Call Flow Solutions Limited	Quickline Communications Limited
Cambridge Fibre Networks Limited	Ranston Farm Partnership
Central North Sea Fibre Telecommunications Company Limited	Runnymede Borough Council
CenturyLink Communications UK Limited	Salfords & Sidlow Parish Council
Chaldon Parish Council	Scotia Gas Network (SGN)
Charlwood Parish Council	SES Water
CityFibre Metro Networks Limited	Sevenoaks District Council

<b>Specific Consultees</b>	<b>Specific Consultees</b>
CityLink Telecommunications Limited	Severn Trent Retail Services Limited
Civil Aviation Authority	SGN
CLH Pipeline System Ltd	Sitec Infrastructure Services Ltd
Coast 2 Capital	Sky Telecommunications Services Limited
Coast to Capital	Sky UK Limited
Cogent Communications UK Ltd	Solway Communications Limited
COLT Technology Services	Southern Electric
Communications Infrastructure Networks Limited	Southern Gas Network
Concept Solutions People Ltd	Southern Water
Cornerstone Telecommunications Infrastructure Limited	Spelthorne Borough Council
County Broadband Limited	Sprintlink UK Ltd
Crawley Borough Council	Spyder Facilities Limited
Crawley CCG	SSE Telecommunications Limited
Development Planning Manager, Developer Services, Thames Water	Subtopia Limited
EE Limited	Surrey and Sussex NHS Trust
Eircom UK Ltd	Surrey CC (Minerals & Waste Planning)
Elmbridge Borough Council	Surrey CC Planning Consultation
Energis Communications Ltd	Surrey Heath Borough Council

Specific Consultees	Specific Consultees
Environment Agency	Surrey Wildlife Trust
Epsom & Ewell Borough Council	Sussex and Surrey Police
EU Networks Fiber UK Limited	Sussex Wildlife Trust
euNetworks Fiber UK Ltd	TalkTalk Communications Limited
FibreSpeed Limited	Tandridge District Council
Fibrowave Networks	Tata Communications (UK) Limited
FLAG Atlantic UK Limited	Telecommunications Wireless and Infrastructure Services Limited
Flood Risk & Network Resilience Assistant - Surrey County Council	Telefonica UK Limited
Fujitsu Services Limited	Telensa Ltd.
Full Fibre Limited	Telent Technology Services Limited
G. Network Communications Limited	Telewest Limited
Gamma Telecom Holdings Ltd	TeliaSonera International Carrier UK Limited
Gas Transportation Company (GTC)	Thames Water Planning Policy
Gatwick Diamond Initiative	Thames Water Utilities Ltd
Gatwick Greenspace Partnership	The Coal Authority
Gigaclear Plc	The Wireless Asset Company Limited
Glide Business Limited (formerly WarwickNet Limited)	The Wireless Infrastructure Company Limited
Government Pipeline & Storage System (GPSS)	Three

Specific Consultees	Specific Consultees
Greater London Authority	Thus plc
GTT Communications	TIBUS (trading as The Internet Business Limited)
Guildford Borough Council	Timico Partner Services Limited
Harlequin Group Ltd	Tiscali UK Limited
Head of Primary Care - Surrey Heartlands CCG	toob Limited
Headley Parish Council	Transport for London
Highways England	Transport for the South East
Highways England (Spatial & Development Control Queries)	Truespeed Communications Ltd.
Historic England	UK Broadband Limited
Historic England South East - Consultations	UK Power Network
Homes England	Ulstercom Ltd
Horley Town Council	Urban Innovation Company (UIC) Limited, (formerly Euro Payphone Ltd)
Horsham District Council	Verizon UK Ltd
Hutchison 3G UK Limited	Virgin Media Limited
Hyperoptic Ltd	Virgin Media Wholesale Limited
In Focus Public Networks Ltd	Vodafone and O2, EMF Enquiries
InTechnology Smart Cities Limited (formerly InTechnology WiFi Limited)	Vodafone Enterprise UK (formerly Cable & Wireless UK)

Specific Consultees	Specific Consultees
Integrated Digital Services Limited	Vodafone Limited
Internet Central Ltd	Vodafone Limited - Environmental and Planning Manager
Internet Connections Limited	Voneus Limited
Interoute Communications Limited	Waldon Telecom Ltd.
IPM Communications PLC	Waverley Borough Council
ITS Technology Group Limited	Wealden District Council
IX Wireless Limited	West Sussex County Council - Planning Policy
KCOM Group Plc	WHP Telecoms Limited
Lancaster University Network Services Limited	Wifinity Limited
Leigh Parish Council	Wightfibre Limited
Lightning Fibre Limited	Wildcard UK Limited
Local Plans South - NHS Property Services Ltd	Woking Borough Council
London Borough of Croydon	WPD Telecoms Limited (formerly Surf Telecoms Limited)
London Borough of Sutton	Zayo Group UK Limited
Lothian Broadband Networks Limited	Zzoomm PLC

## General Consultees

Residents, businesses, registered providers and developers on the Council's Planning Policy Consultation