

**SUSTAINABLE CONSTRUCTION AND RENEWABLE ENERGY
SUPPLEMENTARY PLANNING DOCUMENT**

Contact Officer: Judith Orr (01494 732268)

RECOMMENDATIONS

- 1. Agree the recommended responses to the Sustainable Construction and Renewable Energy Supplementary Planning Document (as set out in Appendix 1) following public consultation.**
- 2. Recommend that the Council adopt the Sustainable Construction and Renewable Energy Supplementary Planning Document, as amended.**
- 3. That Cabinet delegate authority to the Head of Sustainable Development in consultation with the Cabinet Member for Sustainable Development to make minor additional changes to the SPD if required.**

Relationship to Council Objectives

Objective 1 - Efficient and effective customer focused services

The Supplementary Planning Document offers applicants an informative tool that will assist them when preparing householder planning applications and is customer focused.

Objective 3 - Conserve the environment and promote sustainability

The Supplementary Planning Document is designed to directly achieve this objective by ensuring that new developments take account of sustainability issues in their design and construction; encourages the retrofitting of existing buildings so as to improve their performance. The SPD also seeks to increase the use of renewable energy within the District.

Implications

- (i) This matter is a Key Decision within the Forward Plan.*
- (ii) This matter is not within the Policy and Budgetary Framework.*

Financial Implications

Costs associated with the preparation, consultation and eventual publication of the Supplementary Planning Document is within current budgets. Local residents will be encouraged to access the documents via the Council's website and, if supported by members, the Council

could seek to recover printing costs for hard copies by imposing a reasonable charge.

Risk Management Implications

The Supplementary Planning Document will help to ensure that the Council's Core Strategy can be effectively implemented as it provides advice to ensure that development is sustainable and also advice supporting renewable energy schemes. Without this guidance, there is a danger that best practice on sustainability will not effectively be incorporated into both new and existing developments.

Equalities Implications

The Council's Core Strategy was supported by an Equality Impact Assessment (EqIA). This EqIA shows that the Core Strategy does not disproportionately affect one specific group over another. The Sustainable Construction and Renewable Energy Supplementary Planning Document does not include new policy or go beyond the scope of the Core Strategy for Chiltern District.

Sustainability Implications

The Supplementary Planning Document is intended to directly address and improve sustainability issues within the District. The guidance is therefore directly relevant for this objective.

Report

1. The purpose of the Sustainable Construction and Renewable Energy SPD is to assist those submitting planning applications in understanding the techniques and building practices available to improve the sustainability performance of buildings, both new and existing, through their design and subsequent use and to encourage renewable energy schemes in the District in order for development proposals to meet Core Strategy policy requirements. It therefore supplements Policy CS4 (Ensuring Development is Sustainable) and CS5 (Encouraging Renewable Energy) of the Core Strategy for Chiltern District. It is prepared in accordance with the Council approved Local Development Scheme (LDS).
2. The draft Sustainable Construction and Renewable Energy Supplementary Planning Document contained a number of references to the Delivery Development Plan Document and specific emerging policies within it. These have now been removed following the withdrawal of the Plan.
3. Cabinet will recall that they approved the Draft Sustainable Construction and Renewable Energy SPD for Public Consultation on 1st July 2014. Consultation ran for an extended eight week period, to allow for the fact that the consultation covered the summer holidays, from 14th July 2014 to 8th September 2014 and was carried out in

accordance with the Council's adopted Statement of Community Involvement. A total of 24 responses were received covering 149 points. Some points raised have resulted in discussions and clarification outside of the consultation with some respondents.

4. A summary of the responses received and the recommended response to them is included in Appendix 1. The amendments suggested in Appendix 1 are incorporated in the proposed Sustainable Construction and Renewable Energy Supplementary Planning Document, a copy of which is available in the Members Room.
5. The main changes proposed as a result of the representations are summarised below:
 - Factual changes and references to guidance, documents, measures, website links etc which have been updated since the Consultation Draft of the SPD was produced;
 - Some restructuring of chapters has occurred including for Waste (to remove repetition and reflect new guidance) and Energy Consumption and Renewables (two chapters combined and renamed Energy);
 - Changes to the Energy Chapter, including an amendment to the Energy Statement - changing references to total energy to total regulated energy. This change is recommended because of the difficulties in calculating it experienced elsewhere. A clearer distinction is made between low carbon and renewable energy schemes and more text on Combined Heat and Power added to the low carbon section as a result. Further text has also been added on achieving near zero energy dwellings, solar power (and in particular the UK Solar PV Strategy), energy conservation in older buildings, reducing CO₂ emissions, decentralised energy and opportunities for district heating schemes;
 - Extra text is being added on the following topics - climate change, Sustainable Drainage Systems (SuDs), importance of trees, cross boundary impacts, additional water saving measures, changes have been made to the air quality chapter to include advice from development control and also to reflect the fact that a number of areas are close to declaration levels and could become Air Quality Management Areas (AQMAs).
6. A number of representations suggested changes to areas which are currently uncertain but which, when finalised, are likely to have important implications. These include the following:
 - a. **Sustainable Urban Drainage** – the Flood and Water Management Act, passed in April 2010, proposed that Sustainable Urban Drainage Systems (SuDS) would be compulsory in all new developments from April 2014. The Act also proposed that SuDS be approved, adopted and maintained by SuDS approval bodies (SABs). These would be the responsibility of flooding and drainage authorities –

Buckinghamshire County Council in our case – with a consent process separate to planning.

However, in the summer the Government announced a potential change of direction. A consultation document entitled ‘Delivering Sustainable Drainage Systems’, announced that responsibility for approving and maintaining SuDS could fall to the planning system and local planning authorities.

In December, the Government issued another new consultation on a proposal to make lead flood authorities a statutory consultee on planning applications, relating to major developments of 10 or more dwellings and major commercial schemes, for surface water management.

If the consultation proposals are implemented, planning authorities could assume a range of responsibilities from spring 2015. These changes would need to be considered alongside the SPD and it is possible that the SPD may need amending.

b. An **Energy Strategy for Buckinghamshire** is being developed in partnership between the County Council and the District Councils and other public and private stakeholders across Buckinghamshire. A representation asked for the SPD to refer to this Strategy being completed in late 2014. However, this work appears to have fallen behind schedule. If completed before the SPD is adopted then this could be amended, through delegated authority, as recommended in this report (Recommendation 3).

c. **Zero Carbon Homes** – The Government is committed to the requirement that from 2016, all new homes will have to be ‘zero carbon’. In other words, there should be no carbon emissions generated from the energy required to heat and light a home.

The Government states that practical challenges to this policy are the technical feasibility and economic viability of eliminating all carbon emissions by using on site measures, such as fabric insulation, energy efficient services, or the use of renewable energy sources such as solar panels. The Government has therefore set out in a consultation paper proposals for allowable solutions, to allow house builders to offset residual carbon emissions from new homes against savings made on- or off-site, in order to achieve net zero carbon emissions.

The Government states that achieving the zero carbon standard could be particularly challenging for small builders. The consultation paper suggests that smaller housing sites in England should not face the total cost burden of delivering zero carbon homes. The consultation paper explores how this proposed exemption might work. The consultation runs until 7th

January 2015. It is unclear at this stage whether Government proposals will impact on planning decisions or through building regulations.

d. **Housing Standards Review** - As previously mentioned in the Cabinet Report on the Public Consultation Draft of the Sustainable Construction and Renewable Energy SPD, the Housing Standard Review would be likely to have important implications for the contents of the SPD.

A technical consultation ran from 12th September 2014 to 7th November 2014. This included standards for internal floorspace, accessibility, security, water usage and solid waste storage – not energy.

The new regulatory regime is due to be introduced in early 2015. Account may therefore need to be taken of these changes in the final draft of the SPD or if not incorporated before adoption considered alongside the SPD when determining planning applications.

e. **Code for Sustainable Homes** - The initial Housing Standards Review Consultation in August 2013 included a number of topics which weren't covered in the later Technical Consultation. The earlier document implied that the Code for Sustainable Homes could well be replaced by new Building Regulation Standards. This may also be a consideration for the SPD or require the SPD to be amended at some point.

Background papers:

Local Development Scheme (LDS) for Chiltern District 2014-18, August 2014.

Core Strategy for Chiltern District, adopted November 2011.

Statement of Community Involvement, adopted January 2012.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
1	Dr. Peter Borrows	Paragraph 10.29	Generally support the document. SPD should go further and also deal with the fact that the bins and bags can be unsightly and detrimental to the visual environment. Efforts should be made to conceal or screen them and to provide a degree of protection from pests.		Agreed. Text amended accordingly.
2	Mr. David Abbott Highways Agency	Wind Turbines		Would like reference included within the SPD to the DoT Circular 02/13 ". The Strategic Road Network and the Delivery of Sustainable Development" and more particularly to Annex A on wind turbines. It would be helpful to refer to this circular in the SPD in relation to wind turbine proposals that could affect the Strategic Road Network.	Agreed. Add additional text to the end of para. 4.83. In addition, the DoT Circular 02/13 "The Strategic Road Network and the Delivery of Sustainable Development" has been added to the list of references at the end of the Renewable Energy section.
3	Mr. James Fox HS2	General	No comment		No change.
4	Mrs Sandy Keenay Resident	PVs	All new builds should be required to supply at least 50% of their electricity needs by PVs plus water heating panels. Plus any methods possible to encourage present buildings to also be transferred to this method of energy generation.		No change with regard to PV and water heating. The SPD interprets policy from higher tier plans and does not set policy. In addition, the Government is currently trying to reduce the number of standards introduced by local authorities and instead adopt a set of nationally agreed standards.

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5	Mrs Sandy Keenay Resident	Para. 11.49	Biomass heating when using trees should be used with caution. It is fine when used on a small scale but if scaled up too many trees will be felled ruining the area. Also thought needs to be given to both the replacement of these trees and the creatures that live amongst them.		With regards to biomass heating and the use of trees, it is considered that the inclusion in para. 4.76 of the need for woodland management with regard to this fuel and sustainable sources covers this point.
6	Mrs Sandy Keenay Resident	Air Quality	1. Air pollution on a) Trees planted as a screen between road and building will help to protect the health of those using the building. B) once again you have overlooked the problems of bonfires - a major source of pollution in the district. To improve air quality these must be curtailed. Particularly when they contain stable waste. 2. Noise pollution. When they are positioned near housing empty pubs should be allowed to be transformed into houses to reduce noise nuisance. This need not require the destruction of the building if of value.		Para. 7.10 already acknowledges the importance of trees acting as a screen for air pollution. The contribution that bonfires can make to air pollution is acknowledged but is not a planning policy issue and consequently is not included in this document. The issue of empty pubs and their use (under requiring planning permission) goes beyond planning policy and is not appropriate for the SPD.
7	Mr David Holmes Three Rivers District Council	General	No comment		No change.

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8	Ms Jessica Dippie Bucks. County Council	General	Congratulate CDC on the work that has gone into this document. We are excited by the positive steps you have taken to ensure a sustainable future for this District. We are hoping that Schedule 3 of the Flood and Water Management Act will be enacted next year and therefore complement your SPD with regards to sustainable drainage.		Support welcomed. No change.
9	Ms Jessica Dippie Bucks. County Council	Paragraph 2.4	Add a line about design to take account of climate change to future proof development (refer to NPPF/NPPG).		Agreed add additional text to the end of para. 2.4.
10	Ms Jessica Dippie Bucks. County Council	Paragraph 5.24	This would also help with improvement of biodiversity and habitat and be in line with the Water Framework Directive (WFD) requirements.		Agreed. Add additional text to Para. 5.24.
11	Ms Jessica Dippie Bucks. County Council	Paragraph 6.2	The last part of the paragraph is not correct: Buckinghamshire County Council have already taken over the responsibility for surface water flooding from the Environment Agency. This occurs when the Flood and Water Management Act 2010 was enacted and Buckinghamshire County Council became a Lead Local Flood Authority (under this act).		Following the publication of a Government consultation paper in September 2014, Delivering Sustainable Drainage Systems, it is by no means certain that the County Council will be the SAB once Schedule 3 of the Flood and Water Management Act is implemented as the Government appears to have done a u-turn on this issue. Amend if the Government

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			Please could you include at this point that Buckinghamshire County Council will be the SAB when Schedule 3 of the Flood and Water Management Act is implemented.		outcome is revised before the SPD is adopted.
12	Ms Jessica Dippie BCC	Paragraph 6.6	Please could you add a sentence to explain that SuDS have more benefits than just being environmentally friendly.		Agreed. Additional text added to para. 6.6.
13	Ms Jessica Dippie Bucks. County Council	Paragraph 6.7	Please include a sentence to say that when the SAB is enacted developers will need to submit a separate 'drainage application' to the SAB as well as a planning application to the LPA.		This change has not been made because of the uncertainty over whether this requirement will remain in place once the new arrangements are implemented but will be clarified if resolved before the SPD is adopted.
14	Ms Jessica Dippie Bucks. County Council	Paragraph 6.11	Additional wording suggested with regard to the Chesham Pathfinder project and the Aquaprint project.		Agreed. Additional wording added to the para. as suggested.
15	Ms Jessica Dippie BCC	Paragraph 6.20	Asked if the words 'and trapped' could be deleted.		Agreed. Delete the words "and trapped" in the Filter and Swales section of para. 6.20.

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16	Ms Jessica Dippie Bucks. County Council	Paragraph 6.21	Add a sentence to explain that developers need to take ground conditions in to consideration when designating SuDS. Also add a sentence to say that BCC are producing a 'developers guide' to provide relevant information for developers submitting a drainage application to the SAB (when enacted).		Para. 6.20 first sentence already alludes to ground conditions. Added additional text to para. 6.20 to clarify the point. The sentence about the 'developers guide' has not been added due to the uncertainty about the future arrangements.
17	Ms Jessica Dippie Bucks County Council	Appendix 2 - Background	Please include that once the SAB is enacted the development will be subject to approval of a drainage application and planning application.		This text has not been added due to the uncertainty about the future arrangements.
18	Ms Jessica Dippie Bucks County Council	Appendix 2 - Use of the Checklist in the long term	*Sustainable Drainage Systems (SuDS) Approval Body (SAB) *the council – please state which council!		This text has been updated to take account of the Government's changes to the this subject area.
19	Ms Jessica Dippie Bucks. County Council	Appendix 2 - 1a)	Please include the preliminary Flood Risk Assessment (PFRA) in the list of sources of data.		Add the PFRA to the list of data sources.

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20	Ms Jessica Dippie Bucks. County Council	Appendix 2 - 4	It would be useful to include a section on runoff rates. For example have a box for existing runoff rate (l/s) and then proposed runoff rate (l/s). The SAB expectation will be that all new developments restrict their runoff rates to greenfield.		The amount of hardstanding within the site will directly impact upon the runoff rate. The Council will take into account technical advice provided as part of the planning application and/ or consultation advice from others such as the lead local flood authority/ SAB.
21	Mrs Una Christophers	Paragraph 7.8	Only one AQMA in the District - this is a very negative write up, surely it is within the scope of CDC to plant pollution absorbing trees.		Point already covered see para. 7.10.
22	Mrs Una Christophers	Paragraph 7.9	Nitrogen Dioxide. What does "lack of relevant exposure mean relating to areas that might be AQMA? What can residents do to mitigate the effects?		Relevant exposure is defined in Government technical guidance on LAQM. As far as mitigation is concerned, this is outside the scope of the SPD however a link has been added to the Bucks. air quality http://www.bucksairquality.co.uk/ area of the Council's website.
23	Mrs Una Christophers	Section 11	Include information on where CDC is on meeting the target of 15% renewable energy. Please give details (as in Waste section) of how much CDC has achieved.		Additional text added to clarify this point. The data that we have is set out in the Council's Annual Monitoring Report http://www.chiltern.gov.uk/planning/annual-monitoring-report/ However, we don't have comprehensive data for this.

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24	Mrs Elizabeth Richardson Amersham Town Council	Paragraph 6	Greater importance should be made on the orientation of buildings to maximise passive solar design. Where feasible, external doors in new developments should have a secondary inner door to act as an air-lock from the outside, thus preventing heat loss.		These comments appear to relate to the Summary of the SPD rather than the main SPD document. In the main SPD document there is a section on Passive Solar Design at paras. 4.23 - 4.24. Para. 4.25 refers to heat loss from a building. Additional text added with regard to Passivhaus and near zero-energy dwellings at para. 4.11. Internal arrangements are not a planning consideration.
25	Mrs Elizabeth Richardson Amersham Town Council	Paragraph 11	Rain water harvesting should be considered for all new buildings to be used for toilet flushing etc.		The main SPD covers this issue in para 5.17 b. No change.
26	Mrs Elizabeth Richardson Amersham Town Council	Paragraphs 15 / 16	In the 'EA's SuDS Hierarchy, the last two techniques listed (ie "solid paving blocks and porous paving") are among the least efficient techniques, especially in a hilly area such as Amersham. Importance of clearing drainage routes to prevent blocking and subsequent flooding needs to be stressed.		It is correct that permeable surfaces and filter drains are two of the least sustainable SuDS techniques and that is why they are placed at the bottom of the EA's SuDS hierarchy. The clearing of drainage routes is not a District Council function but additional text is to be added at the end of para. 6.9 to clarify this matter.
27	Mrs Elizabeth Richardson Amersham Town Council	Paragraph 23	Have air quality readings ever been carried out at the White Lion Road / Stanley Hill / London Road East area of Amersham, given the high volume of traffic in this vicinity.		See the links in the SPD to the air quality reports on the Chiltern website.

Appendix 1

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28	Mrs Elizabeth Richardson Amersham Town Council	Paragraph 29	When developments are planned, adequate public amenity space should be provided to ensure local play space for children and a community area for adults.		This is covered by Policy CS28 of the Core Strategy and is outside the scope of this SPD. No change.
29	Mr. Richard Copas	Biomass Energy	With Government support for Biomass Boilers through the Renewable Heat Incentive increasing numbers of biomass boilers are being installed in the UK. These are largely fueled by woodchips and pellets of which a significant proportion are imported. The woodlands of the Chiltern Hill should be used to satisfy this demand for fuel which will allow fresh investment in new and replanted woodlands in the local area.		The text in the Biomass heating system refers to fuel coming from sustainable local sources (see previous para. 11.36 and now renumbered as para. 4.56). Local sources would include the woodlands of the Chiltern Hills and therefore this point is already covered.

Appendix 1

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30	Councillor Michael Parker Little Chalfont Parish Council	Water Resources and Quality	Support the principles that underlie the SPD. Change in emphasis in the recommendations on Reducing Water Pollution Incidents from "Developers should...." to read "Developers must...". Alternatively, if such a change in wording is deemed to be impracticable, then wording such as "Developers are expected.."(used in para 14) or "Developers must do what they can..."(used in para 17) should be included to emphasise the importance of this duty of developers.		Requirements are contained in the Core Strategy and the SPD wording is considered appropriate to reflect its planning status.
31	Councillor Michael Parker LCPC	General	Suggest a number of minor editorial changes to the document.		Agreed to make these editorial changes to the main SPD.
32	Mr David Broadley AVDC	General	No comments to make on this consultation.		No change.
33	Ms Tracy Farrell Strategic Environment Team	P. 50 para. 7.11	Suggest minor editorial changes to the document. P.50 para. 7.11		Agreed.
34	Ms Tracy Farrell Strategic Environment Team	P.50 para. 7.12	Needs to be very clear that "sealed" windows are not suitable for living areas and bedrooms regardless of the ventilation provision.		Delete the words "sealed" and amend remaining text accordingly.

Appendix 1

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35	Ms Tracy Farrell Strategic Environment Team	P77	No significance given to the potential for micro turbines to give rise to nuisance, suggest consideration of noise assessment to inform positioning.		Agreed. Text amended accordingly.
36	Piotr Behnke Natural England	Biodiversity	It is good to see the section on Biodiversity included and many of the points included within this should be good pointers for developers when considering new developments.		Support welcomed. Comments noted.
37	Mr Saleem Shamash Arqiva Ltd	Intro. Para. 1.8	No reference is included to the ability of a developer to submit professional evidence to demonstrate that the provision of 10% of the energy requirements from decentralised and renewable energy sources is not feasible or viable.		Agreed. Additional text added to para. 1.8.
38	Ms Rosie Brake Wycombe District Council	General	Setting out standards and requirements for sustainable construction is very much to be welcomed and we support their affirmation.		Support welcomed.

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39	Ms Rosie Brake Wycombe District Council	Para. 11.47	On section 11.47 and following (Stand-alone renewable schemes), it would be helpful if a statement were added about consideration of potential cross-boundary effects of schemes (beneficial or adverse), where the area for assessment overlaps with land in another authority area.		Agreed. Text added to para. 11.47 (now renumbered as 4.74).
40	Mr Edward Barlow Buckinghamshire County Council	General Comments - Energy	The SPD has an important role to play in helping to address GHG emissions from buildings and energy generation in Chiltern District. Predicted climate changes which are already locked in due to past emissions will mean that the landscape character of the District will be altered irrespective of future developments. As such, it may be appropriate to consider the impact of any given development on an evolving (rather than static) baseline. SPD needs to be clear in explaining the mitigating measures which need to be taken to help renewable energy proposals gain planning permission where appropriate.		It is accepted that climate change and its impacts are probably already locked in. However, it is felt that the District Council needs to do what it can to reduce this impact in the future and the SPD will assist in this. The SPD encourages and supports appropriate renewable energy schemes as far as is practicable in a constrained area such as Chiltern District.
41	Mr Edward Barlow Bucks. County Council	Para. 1.2	A stated aim of the SPD is to provide guidance on pd rights for the installation of certain forms of renewable energy generation. There are a few mentions of these in the SPD. It is recommended that either		PD rights are subject to change. It would date the document to set out exactly what they are currently and how they should be applied. It is considered that the best approach is the one adopted in the SPD of linking

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			greater guidance on the application of p.d. rights is provided, or the aims of the SPD are adjusted to reflect its content.		references to the planning portal website (see Para. 4.42).
42	Mr Edward Barlow Bucks County Council	Para. 4.7	The Energy Hierarchy is a useful tool for prioritising actions; however it should not be seen as a 'one option only' framework. Whilst priority should be given to actions/ measures at the top, the best outcomes will be achieved where action is taken across the hierarchy.		Agreed. Add additional text to para. 4.7 to reflect this point.
43	Mr Edward Barlow Bucks. County Council	Para. 4.8	BCC welcomes the inclusion of the Energy Strategy within the SPD and supports its explicit position as a material planning consideration. The publication date for the strategy is not yet known, it is anticipated that this will be Winter 2014 and the para. should be updated to reflect this. A link to the BCC website where further information can be found should be included.		Support for the text welcomed. Para. 4.8 will be updated prior to publication to reflect the latest position.
44	Mr Edward Barlow Bucks. County Council	Paras. 11.1 - 11.9	The SPD should highlight the existence and role of the Buckinghamshire Energy Strategy in this section. This should include its position as a material planning consideration. A link to the BCC website should be included.		Add text to the end of para. 4.34 (see also paras. 4.8 and 4.36 which refer to the production of an Energy Strategy for Buckinghamshire).

Appendix 1

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45	Mr Edward Barlow Bucks. County Council	Para. 11.14	Should clarify that PD Rights for solar PV extend to properties within the AONB and Green Belt, in order to clarify whether this designation has an effect.		See previous comment on pd rights above.
46	Mr Edward Barlow Bucks County Council	11.48 - 11.53	In addition to considering local air quality issues, consideration of the fuel source being proposed for a biomass scheme should also be included. Support should be given for schemes which have plans to locally source biomass.		The text in the Biomass heating system refers to fuel coming from sustainable local sources (see previous para. 11.36 and now renumbered as para. 4.56).
47	Mr Edward Barlow Bucks. County Council	11.66 - Solar Strategy Principles	Include additional text from the Government's Solar PV Strategy. The SPD should provide guidance on the link between the Government's Solar Strategy principles, the role of the Buckinghamshire Energy Strategy and how community input would be considered alongside other factors.		Agreed. Additional text has been added to para. 4.51 re the Government's Solar PV Strategy and additional text added to paras. 4.35 and 4.36 re community energy schemes. In the absence of an adopted Energy Strategy it is considered that it is difficult to go beyond this at this stage.
48	Mr Edward Barlow BCC	11.66 - PV: Level of guidance	The guidance on solar schemes is very brief, particularly in comparison to the level given to wind schemes.		Agreed that the text of paragraph 11.66 (now 4.94) should be adjusted and reference made to larger photovoltaic schemes i.e. those of 1 hectare or above.

Appendix 1

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49	Mr Edward Barlow BCC	Waste - 10.1 - 10.12	This section should make early reference to the Buckinghamshire County Council Minerals and Waste Core Strategy.		Agreed - proposed amendment includes reference to the M&W Core Strategy: setting the strategic context.
50	Mr Edward Barlow Bucks County Council	10.9	The Minerals and Waste LDS 2014 shows the intention to produce a single Replacement Minerals and Waste Local Plan, with a consultation intended to take place during the last quarter of 2014. It is therefore not a "Waste Local Plan" which is being consulted on.		Agreed. Text amended accordingly.
51	Mr Edward Barlow Buckinghamshire County Council	10.1 - 10.22	The SPD should explain that for municipal waste, the District Council is Waste Collection Authority, the County Council is Waste Disposal Authority, and that the four District Councils and the County Council work together in a Partnership, and have an adopted Joint Municipal Waste Management Strategy.		Agreed. Text amended accordingly.
52	Mr Edward Barlow Buckinghamshire County Council	10.10	The reference to the Minerals and Waste Core Strategy (MWCS) should refer to its role in containing a range of policies which promote new waste recovery facilities, to manage wastes arising from both the private and public sectors, and for a wide range of waste materials.		No need to promote all aspects of the CS: just how it sets the strategic framework. No change.

Appendix 1

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53	Mr Edward Barlow BCC	10.13 - Table 5	Table 5 should also include household waste and recycling per household or per capita, to help illustrate the point being made.		Agreed. Amended accordingly
54	Mr Edward Barlow BCC	11.61 - 11.63	It should be highlighted that all waste disposal or recover facilities would be a County Matter application.		The text is only dealing with Energy from Waste facilities relevant to CDC. Clarification to be added.
55	Mr Edward Barlow BCC	11.61	Include a reference to Meadhams Farm, the single landfill site in Chiltern District at present.		Text amended accordingly (para. 4.89).
56	Mr Edward Barlow BCC	Archaeology - General	Recommend that a Historic Environment Section is included or that the historic environment is included in each section.		The SPD provides additional advice on Policy CS4 and CS5. Historic environment issues are covered in other parts of the CS and the NPPF and are it is not therefore considered necessary for the SPD. This point has been clarified in the SPD in the Introduction – What is the scope of the SPD.
57	Mr Edward Barlow BCC	Energy Conservation in Historic Buildings	The focus on new build often fails to fully recognise the significant reductions in emissions that can be achieved through refurbishing and reusing older buildings.		Para. 4.19 of the SPD encourages people to reduce energy use in their existing buildings as well as in new buildings. Additional text added to para. 4.3 to clarify this point.

Appendix 1

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58	Mr Edward Barlow Buckinghamshire County Council	Energy Conservation in Historic Buildings	Poorly designed or inappropriate energy-saving measures can seriously detract from the historic character and fabric of buildings and landscapes, whereas well designed measures can make considerable savings with little or no damage.		Additional text added to the end of para. 4.3 to address this point.
59	Mr Edward Barlow BCC	Energy Conservation in Historic Buildings	English Heritage has produced useful advice on energy efficiency in buildings.		Reference added.
60	Mr Edward Barlow Buckinghamshire County Council	PVs	Solar thermal proposals up to 50kw can in some instances disturb archeological deposits. In sensitive locations the Council should seek professional archaeological monitoring of ground works as a condition of consent.		Additional text added to para. 4.8 making it clear that normal planning application procedures apply to these developments.
61	Mr Edward Barlow Buckinghamshire County Council	PVs	Large scale solar PV arrays above 50kw. The impact on the historic environment will require expert assessment in most cases. The Council will expect all proposals to have been informed by a consultation with the Historic Environment Record		See 56 above.
62	Mr Edward Barlow Buckinghamshire County Council	Energy from Waste	Anaerobic digestion plants may cause direct impacts on archaeology deposits through ground disturbance associated with trenching, foundations, fencing, new access routes etc.		See 56 and 60 above.

Appendix 1

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63	Mr Edward Barlow BCC	Hydro	Hydro schemes - potential impact on the District's cultural heritage and archaeological deposits.		See 56 above.
64	Mr Edward Barlow Buckinghamshire County Council	Biomass	Large biomass schemes can have potential impacts on the District's cultural heritage either directly or visually i.e. impacting on the character or appearance and setting of features of historic interest.		See 56 above.
65	Mr Edward Barlow Buckinghamshire County Council	Biomass	Energy crops - can potentially damage archaeological sites and also impair the setting of historic sites and compromise the visual amenity of the wider landscape.		See 56 and 60 above.
66	Mr Edward Barlow BCC	Air Source Heat Pumps	Heat pumps - may impact on buried archaeology or may affect a Listed Building or Conservation Area.		See 60 above.
67	Mr Edward Barlow BCC	Air Source Heat Pumps	Deep geothermal - the landscape/ visual impact should be considered with great care at the pre-application stage.		See 60 above.
68	Mr Edward Barlow BCC	Wind	Wind turbines - can have direct physical impacts on identified features and also visual impacts on the setting of historic assets.		See 56 above.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
69	Mr Edward Barlow Buckinghamshire County Council	Energy from Waste	Energy from waste - can have potential impacts on the District's cultural heritage either directly or through its visual impact on the character or appearance and setting of features of historic interest.		See 56 above.
70	Mr. Charles Ainger Low Carbon Chilterns Cooperative Ltd	General Comments	Strongly support the provisions of this SPD and commend Chiltern DC for providing it. It provides useful guidance and reference for developers. If used constructively early in the planning application process it can help developers incorporate best sustainability practice without extra construction cost, and with likely running cost savings for house owners.	To assist this advisory process, it would be very useful for CDC to have a list of local and other experts who can advise developers on sustainability, energy and carbon. The ability to gain expert advice at an early stage gives by far the best opportunity to increase the sustainability of development. Perhaps such a list could be compiled by CDC? Low carbon Chilterns Coop would be glad to help.	Not agreed - The Council would be put in a difficult position by including such a list in the SPD in that we would in effect be recommending a company for work without fully checking them out and also favouring one company over another.
71	Mr. Charles Ainger Low Carbon Chilterns	Para. 1.3	We strongly support CDC's intention to offer the SPD advice to all development. We suggest that this should apply to all developments, large and small, and both new and refurbish/ redevelop.		Feel that this is covered by applying to all developments requiring planning permission and providing advice on those that do not require permission.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
72	Anne Mitchell Great Missenden Parish Council	Para. 11.59 and 11.66	Commend the fact that wind turbines are not being encouraged in the AONB and the acknowledgement that new solar installations need to be sensitively placed and give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity.		Support welcomed.
73	Mr. Clark Gordon Environment Agency	General	We are really pleased with the SPD and agree that it covers our issues of concern in sufficient detail to provide additional background and guidance to developers.		Support welcomed.
74	Mr. Clark Gordon Environment Agency	Para. 5.24	Open channels are also much more ecologically valuable (than culverts) and contribute to Water Framework Directive (WFD) objectives.		Agreed. Text amended accordingly.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
75	Mr. Clark Gordon Environment Agency	Para. 5.25	In the first sentence, obstacle to fish passage is not a reason for "water quality failure" (which tends to indicate chemical failure). It would be correct to say "One of the reasons for WFD failure..." or simply "One of the reasons for failure..." Additionally the implication of the paragraph is that if the structures are not redundant or are protected (e.g. listed), that they can be left as they is. This is not the case, as we would generally expect other solutions to fish passage to be implemented if the structures could not be removed entirely.		Agreed. Text altered as suggested.
76	Mr. Clark Gordon Environment Agency	Para. 5.26	Clarify how to measure the eight metre buffer zone. Additionally, make it clear that applications that propose to install hard bank protection will not be supported.		Agree. Footnote added to clarify the point at which the measurement should be taken. Proposed to add in a comment with regard to the hard bank installations.
76	Mr. Clark Gordon Environment Agency	Para. 9.19 (bullet 1)	In some cases, it may be better for tree cover to be removed or thinned to allow more light to reach a heavily shaded channel. This is particularly important if there is the possibility of connecting or improving water vole habitat.		Agree to amend the text to reflect this point (Para. 9.20 i).

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
77	Mr. Colin White Chilterns Conservation Board	General	I am writing to let you know that the Board does not have any comments to make.		No change.
78	Miss Hannah Butterfield South Bucks District Council	Para. 2.4	This para. suggests that by signing the memorandum of understanding, the Climate Change Act 2008 only applies to the public sector. Suggest rewording to include businesses and individuals i.e. everyone should be meeting the targets.		Text amended to reflect this point.
79	Miss Hannah Butterfield South Bucks District Council	Para. 2.5 (bullet 1)	Suggest additional wording of 'thereby minimising waste'.		Point is covered in other parts of the Development Plan. No change.
80	Miss Hannah Butterfield South Bucks District Council	Para. 2.5 (bullet 3)	Suggest a change of wording to 'increase' protect and enhance biodiversity and green infrastructure 'as this will increase resilience to likely climate change impacts such as excessive heat and flooding.'		Point is covered in other parts of the Development Plan. No change.
81	Miss Hannah Butterfield South Bucks District Council	Para. 2.6 (bullet 2)	Feed-in-tariffs should be Feed-in-Tariffs (FIT).		Agreed. Change made.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
82	Miss Hannah Butterfield South Bucks District Council	Para. 2.6 (bullets 3 and 4)	Both measures are now out of date. We advise reading the literature on the Renewable Heat Incentive (RHI) as it applies to all sectors.		References to these measures to be removed from the SPD.
83	Miss Hannah Butterfield South Bucks District Council	Para. 3.2 and 3.3	Query whether the CSH should be mentioned, as when this document is complete, the CSH will be finished and other documents will supersede it such as the Building Regulations. Provide a link instead?		The Code for Sustainable Homes is one of a number of areas set out within the SPD that may well change in the near future. The SPD will set out the latest position at the time of publication and make it clear that there may be other considerations to be covered in the SPD.
84	Miss Hannah Butterfield South Bucks District Council	Para. 3.11	This text is out of date. It should include information on the Fabric Efficiency Rate of a building not just SAP. See Building Regulations AD L1A for more information.		Agreed. Text updated to take on board this point.
85	Miss Hannah Butterfield South Bucks District Council	Para. 3.22	Suggest a change of wording from 'the Government have' to the 'Government has'.		Agreed.
86	Miss Hannah Butterfield South Bucks District Council	Para. 4.1	Suggest a change of wording to 'minimise climate impact' from buildings 'and' to help reduce energy costs		Agreed.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
87	Miss Hannah Butterfield South Bucks District Council	Para. 4.3	Update the current position as new targets are within the Building Regulations ADs.		Agreed. Amendments made to the text.
88	Miss Hannah Butterfield South Bucks District Council	Para. 4.5	Change Feed-in-tariff to Feed-In-Tariff.		Agreed
89	Miss Hannah Butterfield South Bucks District Council	Figure 1	Change the wording to 'Use Fossil Fuels more Cleanly'.		Change already suggested as a minor editorial change.
90	Miss Hannah Butterfield South Bucks District Council	Para. 4.7	Suggested additional wording to include: 'this would also make development more cost effective and "able to" recover investment costs through operational savings.		Agreed. Text amended.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
91	Miss Hannah Butterfield South Bucks District Council	Para. 4.8	Suggest a number of changes relating to the production on the Energy Strategy for Bucks. The strategy will be published late 2014. Suggest that we delete the final sentence i.e. that 'Once prepared this will be a material planning consideration that can be used in the determination of planning applications' as it will not be adopted SPD for any of the Districts.		Suggested changes agreed with the exception of 'the strategy will be published in late 2014' as adoption still seems to be some way off. In addition, we will be retaining the last sentence in the document. It is accepted that whilst the Energy Strategy is unlikely to be adopted by any of the District Councils as SPD it can be a material consideration and forms part of the background evidence.
92	Miss Hannah Butterfield South Bucks District Council	Para. 4.9	We recommend that this sentence is referenced as it is a bold statement.		This wouldn't fit in with the documents formatting. No change.
93	Miss Hannah Butterfield South Bucks District Council	Para. 4.10	We query whether there is a more recent dataset available from the DECC website than 2009 data? If so, we recommend updating.		The 2009 data was only put on the website in 2013. No change.
94	Miss Hannah Butterfield South Bucks District Council	Para. 4.21	Some additional information on designing in minimum energy use and designing out excessive energy use would be useful. Good design will prevent excessive energy use, not just the use of sustainable construction materials.		Agreed. Text amended accordingly.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
95	Miss Hannah Butterfield South Bucks District Council	Para. 4.28 4.29? Table 4	For householder extensions, an energy report is produced by Building Control.		Add this information into Table 4.
96	Miss Hannah Butterfield South Bucks District Council	Figure 2 and Para. 4.30	Total energy use cannot be calculated. You can only include energy from fixed building services (e.g. lighting and heating) and for Fabric Energy Efficiency (FEES) (e.g. thermal elements via Simplified Building Energy Models (SBEM) or Standard Assessment Procedures (SAP). There are existing packages that calculate the target emissions rate and actual emissions rate. We advise that you speak to Building Control to find out what is available.		Total energy use to be amended to total regulated energy use.
97	Miss Hannah Butterfield South Bucks District Council	Para. 4.32	This is a good point to make. We suggest highlighting this in bold. This is a common proposal at South Bucks District Council.		Support of this para. welcomed. However, it doesn't fit in with the document formatting. No change.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
98	Miss Hannah Butterfield South Bucks District Council	Section 4 (unsure of where)	Some further text on decentralised energy would be useful i.e. stating that the main reasons for installing decentralised energy is to create energy production untied to the national grid and fossil fuels and making the UK's energy supply more resilient for the future.		Agreed. Additional text added to para. 1.9 to reflect this point.
99	Miss Hannah Butterfield South Bucks District Council	Para. 5.15	The term potable water is now not used; instead refer to 'wholesome'.		'Potable' water is considered a more relevant term. No change.
100	Miss Hannah Butterfield South Bucks District Council	Para. 5.16	We would query what other evidence is available for this water measure other than Code for Sustainable Homes, as this is unenforceable. Building Reg. AD G has an enforceable level, but this is currently 125 litres of water per person per day.		It is recognised that this is unenforceable and that is why the document is worded as it is i.e. the Council <u>expects</u> as opposed to the Council requires.
101	Miss Hannah Butterfield South Bucks District Council	Para. 5.17	We suggest an additional example of "install small bath and spray water restrictors for showers/ or install gravity fed showers that are not electrically pumped."		Agreed. Text amended accordingly.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
102	Miss Hannah Butterfield South Bucks District Council	6. Background	It might be worth mentioning climate change and the likely increases of short heavy bursts of rainfall which will contribute to surface water flooding incidences.		Agreed. This text has been added to the end of para. 6.1.
103	Miss Hannah Butterfield South Bucks District Council	Para. 6.2	We suggest the removal of the following text as it will date the document and is unnecessary: "The Implementation of the SuDS Approval Body (SAB) was due to remove surface water flooding from the remit of the Environment Agency from April 2014. However, the implementation of the SAB has been delayed and we are waiting to hear from DEFRA to find out when it is now going to be implemented."		To be incorporated in other changes to the SPD.
104	Miss Hannah Butterfield South Bucks District Council	Para. 6.20	We suggest a change of wording to the paragraph to include: "Sustainable Drainage Systems (SuDS) need considering prior to design and need to be designed into the development at the very start of the process, thus ensuring appropriate SuDS for the development". This is a very critical point and should be set out in bold. SuDS are not an afterthought and need to be integral to the project.		Agreed. Text amended accordingly.
105	Miss Hannah Butterfield SBDC	Para. 7.9	Suggest changing NO2 to NO ₂ .		Agreed.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
106	Miss Hannah Butterfield South Bucks District Council	Para. 7.9	It is important to recognise that a number of locations in Chiltern are just below the declaration levels, therefore may become AQMAs in the future.		Agreed. This text has been added to para. 7.9.
107	Miss Hannah Butterfield South Bucks District Council	Para. 7.11	The most up to date guidance which should be referenced in this paragraph is the IAQM guidance (2014) on Assessment of dust from demolition and construction 2014.		Reference to be updated accordingly.
108	Miss Hannah Butterfield SBDC	Para. 7.13	The email address that should be used is sustainable@chiltern.gov.uk.		To be updated.
109	Miss Hannah Butterfield SBDC	Para. 7.16	The guidance listed in this paragraph will be '2014 update' by the time work on the SPD has completed.		To be updated.
110	Miss Hannah Butterfield SBDC	References	We suggest adding www.bucksairquality.co.uk into this list.		Agreed. Add to references.
111	Miss Hannah Butterfield SBDC	Chapter comments 7	In light of the recent decision by the European Commission to formally launch infraction proceedings against the UK for the breach of nitrogen dioxide limit values under the EU Air Quality Directive, we welcome the inclusion of air quality in this SPD. It is clear that the planning system has an important role to play in improving air quality and reducing exposure to air pollution.		Support welcomed.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
112	Miss Hannah Butterfield South Bucks District Council	Chapter comments 8	We note that there is no reference to the standards which would normally be considered when dealing with planning applications e.g. BS4142. It would be useful to include the list of specific standards in which to assess applications by.		Additional references to be added to the NPPG with regard to noise. In addition, the Noise Policy Statement for England March 2010 to be added as a reference at the end of the section.
113	Miss Hannah Butterfield SBDC	Para. 11.2	It would be useful to define micro-generation.		Agreed. Definition added as a footnote to para. 4.27.
114	Miss Hannah Butterfield South Bucks District Council	Para. 11.4	This para. is quite wordy. To make it clearer we suggest this text is turned into bullet points or a list.		Agreed para. 11.4 (4.29 to be amended accordingly).
115	Miss Hannah Butterfield South Bucks District Council	Para. 11.5	This paragraph should also mention community mass funding opportunities as a measure that can be supported in the plan making process. Also, add text on the latest Government policy on using commercial roofs to increase the installation of pvs/ solar energy.		Agreed. Additional text to be added to paras. 4.35 and 4.36. The second point is already covered in para. 4.51 i.e. included as part of the UK Solar PV Strategy and does not therefore need to be repeated here.
116	Miss Hannah Butterfield South Bucks District Council	Para. 11.7 - 11.12	Some good points are made in this section. We recommend retaining this text and the targets within the document.		Support welcomed. There are no plans to remove this text.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
117	Miss Hannah Butterfield SBDC	Para. 11.15	The website link defaults to the 'flat packed houses' website? The low carbon building programme no longer exists.		Previous link to be removed and replaced with a new link to the carbon trust website and the text adjusted accordingly (para. 4.43).
118	Miss Hannah Butterfield SBDC	Para. 11.16	Suggest a change of wording from 'Community initiatives are' to 'Community initiatives will'.		Agreed.
119	Miss Hannah Butterfield SBDC	Para. 11.24	This sentence (para.) is unnecessary as Solar Water Heating systems are talked about previously from 11.18 onwards.		Agreed. Text deleted accordingly.
120	Miss Hannah Butterfield South Bucks District Council	Para. 11.28	There is a national map available for wind speeds across the UK. It would be good to add this to the document. We suggest trying to access the map from the DECC website in the first instance.		This map has been accessed and an extract included for Chiltern District at various different heights above the ground see figures 7, 8 and 9. No change.
121	Miss Hannah Butterfield South Bucks District Council	Paras. 11.30 - 11.35	The distinction between renewable and low carbon energy schemes should be clearer. Under low carbon technologies, Combined Heat and Power (CHP) has not been discussed. This should be added in as CHP provides a vital source of heat and electrical energy, especially for District heating/ standalone decentralised energy.		It is acknowledged that this distinction could be further clarified. Text to be adjusted accordingly see para. 4.26. In addition, to re-order the schemes so as to make it clear which schemes are renewable and which are low carbon and to add in additional text with regard to Combined Heat and Power schemes.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
122	Miss Hannah Butterfield South Bucks District Council	6. Biomass	We recommend moving this section to follow wind technologies as it is a renewable energy. Then follow the Biomass section with Low Carbon Technologies.		Agreed.
123	Miss Hannah Butterfield South Bucks District Council	Para. 11.41	The Low Carbon Building Programme no longer exists so this wording should be removed. Here, you should refer to the DECC website and insert the relevant up-to-date text instead.		Agreed. This sentence to be deleted.
124	Miss Hannah Butterfield SBDC	7. Micro Hydro	We recommend moving this section to follow the Biomass section prior to the Low Carbon Technologies.		Agreed.
125	Miss Hannah Butterfield South Bucks District Council	Chapter comments 11	District Heating opportunities have not been discussed in this chapter, and should be. District Heating can be put into new larger developments.		Additional text to be added to the SPD dealing with District Heating schemes (para. 4.64).
126	Mr. Martin Small English Heritage	Chapter 1	We are not clear why the historic environment is not considered in the SPD, but if it is not to be then there should at least be a reference to the historic environment and advice on where further information can be found (as there is for transport in paragraph 1.15).	We think that the SPD should include a section on the historic environment, or at least a link to where further information on this matter can be found (including the English Heritage guidance identified above).	See 56 above.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
127	Mr. Martin Small English Heritage	Chapter 4	Reference should be made to the English Heritage guidance on older properties and energy efficiency.		Add to the references section of the Energy Consumption Chapter of the SPD.
128	Mr. Martin Small English Heritage	Chapter 11	Reference should be made to English Heritage guidance on generating energy in older houses and to English Heritage guidance on renewable energy generally, which includes guidance on wind energy.		Both of these references to be added to the references section of the Energy Consumption Chapter of the SPD.
129	Mrs Ellie Henderson The Woodland Trust	Chapter 1 Table 1	In table 1 under section L I would like to see woodlands added to the list.		Table 1 is an extract from the Adopted Core Strategy for Chiltern District. Changes cannot be made to this document as part of the consultation on the SPD.
130	Mrs Ellie Henderson The Woodland Trust	Section 4.25	We would suggest that using trees in new developments can make buildings more energy efficient. We would like to see this added in this section (a point about the use of trees in this way).	The report entitled: 'No trees, No future' (Trees and Design Action Group, 2010) states: There is a growing body of evidence that trees in urban areas bring a wide range of benefits. They (trees) can improve the environmental performance of buildings by reducing heating and cooling costs, thereby cutting bills.	Agreed. Additional text to be added as a bullet point to para. 4.25. The report also to be added to the reference section at the end of this paragraph.

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
131	Mrs Ellie Henderson The Woodland Trust	Water Quality Chapter 5	Creation of trees and woodland buffers to improve water quality - Buffers adjacent to surface waters, pollution sources or pollution pathways can improve water quality. - Native woodland creation to improve water quality - native woodland creation on arable, improve pasture and urban areas can improve water quality. - Native woodland creation as part of SuDS can reduce surface water runoff and retain pollutants on brownfield sites.		The importance of trees is acknowledged but it isn't clear what changes are sought and in any event this issue is covered in other parts of the Development Plan and NPPF.
132	Mrs Ellie Henderson The Woodland Trust	Flooding Chapter 6	Modelling suggests that major flood events can be delayed and attenuated where woodland creation is targeted to bottlenecks in 100-year flood envelopes. - At the local scale woodland creation also needs to be appropriately targeted.		As stated above, it isn't clear what changes are sought to the document as a result of your comments. Suggest adding the words 'tree planting' to the second sentence of para. 6.18 to cover this point.
133	Mrs Ellie Henderson The Woodland Trust	Air Quality Chapter 7	There is evidence that urban trees remove large amounts of air pollution and improve urban air quality (Nowak et al 2006).		The importance of trees in air quality is referred to on a number of occasions within this chapter. Para. 7.10 specifically refers to the importance of Green Infrastructure in mitigating pollution from cars. No change.
134	Mrs Ellie Henderson The Woodland Trust	Biodiversity Chapter 9	We would like to highlight the importance of protecting ancient woodland from development. Ancient woodlands are irreplaceable.		The importance of protecting ancient woodland is recognised in the Core Strategy and is not therefore considered appropriate to refer to it again in the SPD.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
135	Mr Ben Coakley CDC	General	We fully support both the aims and content of the SPD. The benefit to local developers and indeed the community is clear.		Support welcomed.
136	Mr Ben Coakley CDC	Para. 2.6	These schemes have now been updated and therefore the more recent schemes should be highlighted.		It is acknowledged that changes have been made to these schemes. Rather than date the document it is considered that references to the specific schemes set out in para. 2.6 should be removed.
137	Mr Ben Coakley Chiltern District Council	Para. 4.26	Delete paragraph. Improvements in energy efficiency made to a building do not count towards the 10% minimum target contained in Policy CS5 and consequently this paragraph is incorrect.		Agreed. This paragraph is recommended for deletion.
138	Mr Ben Coakley CDC	Structural change	Consider combining the Energy and Renewable Energy Chapters.		Agreed. These two sections to be combined into one chapter in the SPD.
139	Mr Ben Coakley Chiltern District Council	Renewable Energy Chapter 11	Biomass boilers - whilst we are fully supportive of the climate change benefits of biomass boilers and the text should remain, they can in some cases be detrimental to local air quality.		The impacts of biomass boilers on air quality are covered in para. 4.78 of the SPD.
140	Mr Ben Coakley CDC	Para. 6.11	Welcome inclusion of Aquaprint concept in relation to surface water flooding.		Support welcomed.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
141	Mr Ben Coakley Chiltern District Council	Air Quality	The Council may wish to consider a mechanism for air quality offsetting (equivalent to a s106 agreement) for those areas where air quality is currently failing standards and local measures are not possible.		The SPD doesn't have the power to set new policy that isn't already set out in higher tier documents. No change.
142	Mr Ben Coakley Chiltern District Council	Para. 7.9	It is important to recognise that a number of locations in Chiltern are just below the declaration levels, therefore may become AQMAs in the future.		Agreed. Text of para. 7.9 adjusted accordingly.
143	Mr Ben Coakley Chiltern District Council	Para. 7.11	The most up to date guidance that should be referenced in this paragraph is the IAQM Guidance (2014) on Assessment of dust from demolition and construction 2014.		Delete the previous references at the end of paragraph 7.11 and update with this guidance.
144	Mr Ben Coakley Chiltern District Council	Air Quality	Provide a generic example of the type of AQ assessment that is required to accompany a planning application. This may be through reference to the new (2014) EPUK/IAQM guidance for planners.		This guidance has been added to the references section.
145	Mr Ben Coakley CDC	Para. 7.11	"through dust and emissions" is written twice.		Agreed.
146	Mr Ben Coakley CDC	Para. 7.13	The email address that should be used is sustainable@chiltern.gov.uk.		Agreed.
147	Mr Ben Coakley CDC	References	We suggest adding the Bucks Countywide website for air quality.		Add to references.

Appendix 1

Com. No.	Representor	Part of Draft SPD	Comment	Suggested Change	Recommended Response
148	Mr Ben Coakley CDC	Low Carbon Technologies	Mention should be made of District Heating opportunities.		Additional text to be added to address this (see 4.64 and 4.65).
149	Mr Ben Coakley CDC	Appendix 2	This will require continued working with the Bucks Strategic Flood Committee and the eventual implementation of the SAB.		Noted.