North Somerset Council

Report to the Council

Date of Meeting: 20 April 2021

Subject of Report: Updating the Creating Sustainable Buildings and Places Supplementary Planning Document

Town or Parish: All

Officer/Member Presenting: Councillor Tonkin, Executive Member for Planning, Highways and Transport

Key Decision: No

Reason: Council report

Recommendations

It is recommended that the updated Creating Sustainable Buildings and Places Supplementary Planning Document (SPD) is adopted as council policy.

1. Summary of Report

1.1. This report sets out the proposed amendments to the Creating Sustainable Buildings and Places Supplementary Planning Document, which was originally adopted in 2015. The updates contained within the SPD will support the Council's objective of becoming carbon neutral by 2030.

1.2. Public consultation on the updated SPD took place between 12 February 2021 and 26 March 2021.

1.3. The principal changes to the 2015 SPD are summarised as follows. Further detail is provided in the table at paragraph 3.17 and the revised text is set out at Appendix B.

- Document updated in relation to the climate emergency and changing national guidance.
- All new residential development must demonstrate Code for Sustainable Homes Level 4 equivalent improved energy performance standards. This equates to an improvement on Building Regulations of 19% of Part L1A. This applies to all new residential development, including conversions.
- Non-residential buildings must demonstrate BREAAM standard or its equivalent.
- The renewable energy requirement is a minimum and is in addition to the Code for Sustainable Homes Level 4 equivalent energy performance compliance.

1.4. The Council is asked to review the updated SPD and noting the revisions, approve as council policy.

2. Policy

2.1. The Council's Corporate Plan 2020-24 includes 'green' as one of three key themes. This emphasises the importance of bringing forward actions relating to tackling climate change as a key factor in all policy and strategic decisions.

2.2. The Council declared a climate emergency in 2019 and has an overarching goal to become carbon neutral by 2030. The Climate Emergency Strategic Action Plan (2019) sets out an aim for 'all new homes to be zero carbon or net carbon plus.' In order to achieve this ambition, it is crucial for all new development to achieve the highest possible carbon reduction standards as soon as possible.

2.3. The Planning and Energy Act 2008 allows planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the Building Regulations.

2.4. National Planning Practice Guidance states that Local Planning Authorities can set local planning policy which requires energy performance improvements above the level required through the national Building Regulations – equivalent to Code for Sustainable Homes Level 4.

3. Details

3.1. The Creating Sustainable Buildings and Places SPD was originally adopted in 2015 and provides specific guidance on how to comply with Core Strategy Policy CS1 – 'Tackling climate change and carbon reduction' and CS2 – 'Delivering sustainable design and construction'.

3.2. Updating the SPD has provided the opportunity to update the guidance on complying with the requirements of both of these policies. This has included providing additional information on the specific requirements of Policy CS1. This information relates to renewable energy use, active travel solutions, green infrastructure, waste minimisation, sustainable drainage, climate change adaptation/resilience, energy and water efficiency.

3.3. The updated SPD was consulted on between 12 February and 26 March 2021. Responses received to this consultation (detailed in Appendix A) have led to some changes to the SPD which is now being proposed for adoption.

3.4. One of the main purposes of the updated SPD it to clarify the Council's position in relation to the requirements of the adopted Core Strategy Policy CS2 (*Delivering Sustainable Design and Construction*). Clause 3 of this policy requires compliance with the Code for Sustainable Homes. Although the Code was withdrawn by government soon after this policy was adopted, it has subsequently been confirmed that councils can require performance standards on new residential development equivalent to Level 4 of Code for Sustainable Homes.

3.5. The Council will now require all new residential development registered after the date that the updated SPD is adopted, to demonstrate Code for Sustainable Homes Level 4 equivalent improved performance standards. This equates to an improvement on Building Regulations of 19% of Part L1A: *Conservation of Fuel and Power for new*

dwellings. This is a 19% reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on the 2013 edition of the 2010 Building Regulations (Part L). The TER is met solely from energy efficiency measures.

3.6. The Council's approach to the assessment of new development proposals will eventually need to align to the climate emergency declaration and provide policy standards for net zero carbon development. The new Local Plan 2038 is currently being developed and evidence is being commissioned to understand the best route to achieve net zero policy standards. However, new Local Plan policy which directly addresses the climate emergency will not be in place until the new plan is adopted, which is programmed to be in 2023.

3.7. The updated SPD once adopted, will provide an interim uplift in the policy requirement for new homes to be built to higher energy performance standards with associated carbon emission reduction and provide a meaningful stepping-stone on the route to zero carbon development.

3.8. We are aware from feedback from developers that the cost of achieving BREEAM accreditation was causing difficulties and have set out within the revised SPD that the Council will accept an equivalent standard without the need for formal accreditation. However, where BREEAM accreditation is not used, the council will require a clear demonstration of how the building(s) will be constructed to an equivalent standard through the submission of independent supporting information. This revised approach enables alternatives to be proposed, provided they are of an equivalent standard.

3.9. The overarching aim of Core Strategy Policy CS2 is to 'demonstrate a commitment to sustainable design and construction, increasing energy efficiency through design, and prioritising the use of sustainable low or zero carbon forms of renewable energy generation in order to increase the sustainability of the building stock across North Somerset.'

3.10. Clause 3 of Policy CS2 requires Code for Sustainable Homes Level 3, from 2010 reaching Code Level 6 compliance in 2016. The intention in setting this policy was to steadily ratchet up the sustainability performance of new residential developments, which included increased energy efficiency measures.

3.11. In 2015, the Government withdrew the Code for Sustainable Homes (CSH) as part of the Housing Standards Review. Alongside this, a Written Ministerial Statement stated that an amendment to the Planning and Energy Act 2008 would be enacted which would prevent local authorities from setting energy performance improvements higher than Building Regulations.

3.12. As a result of this, the Council provided a statement confirming that CSH compliance would no longer be required when submitting development proposals. This has meant that since 2015, the Council has not required new residential development proposals to comply with energy performance standards in excess of those set out in Building Regulations.

3.13. However, the amendment to the Planning and Energy Act 2008 was never enacted and the National Planning Practice Guidance (2019) signalled a revised approach. This states that energy performance standards that are higher than Building Regulations can be set by local authorities, but only up to the equivalent of Level 4 of the CSH. The Future Homes Standard consultation response (2021) also clarified the role of Local Planning Authorities in setting energy efficiency requirements for

new homes. It confirms that in the immediate term, the government will not amend the Planning and Energy Act 2008, which means that local authorities retain the power to set local energy efficiency standards for new homes.

3.14. There are many examples of other local authorities requiring Code for Sustainable Homes Level 4 equivalent compliance. This includes Bath and North East Somerset, Somerset West and Taunton, Bristol, Brighton and Hove, Cambridge, Manchester, Guildford, Eastleigh, Havant, Ipswich, Milton Keynes, Oxford, Reading and Suffolk Council's.

3.15. Provisions in the Planning and Energy Act 2008 also allow development plan policies to impose 'reasonable requirements for (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development.' Clause 2 of Policy CS2, sets out this local requirement: 'require the use of on-site renewable energy sources or by linking with/contributing to available local off-site renewable energy sources to meet a minimum of 10% of predicted energy use for residential development proposals involving one to nine dwellings, and 15% for 10 or more dwellings; and 10% for non-residential developments over 500m² and 15% for 1000m² and above.'

3.16. For clarification, the above renewable energy requirement is in addition to Code for Sustainable Homes Level 4 equivalent energy performance compliance.

3.17. A full list of the changes to the SPD are detailed below:

Section of the updated 2021 SPD	**Summary of changes from the original (2015) version**
Executive Summary	Amended to reflect and summarise the content of the updated SPD, as summarised below.
Why is the council updating the SPD?	Revised text relating to the rationale for updating the SPD i.e. clarification on setting energy performance policy higher than building regulations, response to the Council's Climate Emergency declaration and changes in national and local policy since 2015. 5. Made it clearer that Code 4 equivalent compliance is for all new residential development applications, including conversions. 7. Clarified that the renewable energy requirement is a minimum percentage required standard. 8. Clarified that an equivalent standard to BREEAM certification would be permitted.
1. Introduction	Revised text relating to the Councils Climate Emergency declaration 2019 and the need to transition towards zero carbon development
2. Policy context	• Updated references to Climate Change Act – net Zero 2019 amendment. • Updated references to the National Planning Policy Framework - 2019 version. • Added reference to the National Planning Policy Guidance – and clarification of Council's ability to set energy performance standards higher than Building Regulations. • Added reference to the NSC Climate Emergency Strategy and Action Plan. • Added reference to the Council's UK100 pledge.

	• Removed reference to the NS Replacement Local Plan. • Clearer references to both CS1 – *Addressing Climate Change and Carbon Reduction* alongside CS2 *Delivering Sustainable Design and Construction policy* requirements.
3. Sustainable Design Principles – Code for sustainable Homes	• Added explicit reference to the Code for Sustainable Homes requirement. • Added clarification in relation to the implementation of Code equivalent standards. • Amended sections to make clearer references to CS1 policy requirements relating to energy use, waste management, water use, sustainable and active travel. • Paragraph 3.7: re-worded detail on the energy hierarchy • Paragraph 3.10: reworded detail on embodied energy and whole life cost of buildings • Paragraph 3.14: removed examples of passive design measures • Paragraph 3.16: added wording, where possible the orientation of a building should be within 30 degrees from south • paragraph 3.23 re-worded to emphasise importance water efficiency ahead of water re-use • Paragraph 3.26 added wording from Environment Agency regarding water quality • Paragraph 3.29 - 3.36 added more detail on the Active Travel Strategy • Paragraph 3.37 added wording on Land Use Ecology to emphasise importance of natural regeneration
4. Renewable and Low Carbon Energy	Paragraphs 4.8 and 4.9 details that the wind and solar SPDs will be reviewed in light of the Council's climate emergency declaration. Removed paragraphs detailing 'issues to consider' for various technologies. Included reference to Renewal Energy Resource Assessment Study, available Spring 2021.
5. BREEAM requirements	Added in detail regarding when BREEAM standards cannot be met.
6. Sustainable Drainage Systems	• Updated references to adopted guidance. • Added that Wessex Water now adopt and maintain SuDS which meet their standards.
7. Climate change adaption measures	• Added reference to the CS1 policy requirement and the requirement for developers to demonstrate through the sustainability/energy statement, how climate resilience has been considered as part of the design. • Added reference to the CS1 and also the CS9 policy requirement relating to Green Infrastructure. Included reference to the GI strategy and to rewilding.

8. The Future Homes Standard and future zero carbon policy	• Included specific reference to the Future Homes Standards consultation and the transition to zero carbon. • Included reference to the West of England Cost of Zero Carbon study and intention to set zero carbon standards in the new Local Plan 2038.
9. Retrofitting energy efficiency, renewable and low carbon technologies	• Added reference to solar panels and electric vehicle charge points under permitted development. • Added detail relating to external wall insulation and the requirements for planning permission if in a conservation area or an AONB. • Amended detail about solar panels in conservation areas – may not be wall fronted if facing the highway. • Added reference to the Historic England guidance on the whole building approach to energy efficiency in historic buildings.
10. Viability Assessments	Amended last sentence in principle of viability: *Where a lack of viability is demonstrated, the Council will take this into account in its decision making*~~. and will seek to ensure that the policy requirements do not act as a barrier to otherwise acceptable development from coming forward.~~
11. Planning application	None.
12. Monitoring and Review	Link provided to the Annual Monitoring Report.
Appendix 1: checklist	• Moved from Section 2 of the SPD version 2015. • The checklist has been updated with clearer references to both CS1 and CS2 policy requirements. Developers are asked to check the appropriate boxes to demonstrate compliance. • Clarified that the policy also applies to residential conversions.
Appendix 2: documentation to submit to demonstrate compliance with CSH level 4 equivalent energy standard.	Added examples of SAP compliance reports.
Appendix 3: documentation to submit to demonstrate BREEAM energy performance compliance	Added BRUKL summary report for non-residential buildings.
Glossary	None.
Case study detail	Moved from the beginning of the document.

3.18. The new draft SPD containing the revised text is provided at **Appendix B**.

4. Consultation

4.1. The draft updates to the Creating Sustainable Buildings and Places SPD were subject to six weeks public consultation, between 10 February 2021 and 26 March 2001. This is in line with the Council's Statement of Community Involvement.

4.2. Sixty-four responses were received, and these with the Council's response, are summarised in Appendix A. The principal issues raised were that whilst the updated guidance is welcomed, the policy does not go far enough to address to climate emergency. It is explained that SPD guidance supports adopted local policy and cannot set new policy standards and that the new Local Plan 2038 will consider the potential of setting higher standards. Some comments questioned the detail of some of the sustainable design strategies. This included the measures to avoid overheating, and the relevant paragraphs have been re-worded in response. Some respondents were concerned about the implications on viability of the enhanced standards, especially for small scale developments. The viability section states that applicants can discuss viability concerns when submitting planning applications. Some comments were supportive of the Council's stance for accepting BREEAM equivalent standards.

4.3. The SPEDR panel was notified of the consultation on the proposed changes to the SPD at their meeting on 10 March 2021.

5. Financial Implications

5.1. There are no direct financial implications to the Council arising from the adoption of an updated Supplementary Planning Document.

5.2. Additional staff resources and training may be required to support the detailed sustainability and energy assessments and compliance monitoring. This will be investigated through existing budgets and the forthcoming Place Directorate transformation programme.

6. Costs

6.1. The costs of revising the SPD are met from existing service budgets.

7. Funding

7.1. No additional funding is required to update this SPD.

8. Legal Powers and Implications

8.1. The Planning and Compulsory Purchase Act (2004) Section 19 (1A) requires local planning authorities to include in their Local Plans "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change". This will be a key consideration when a Local Plan is examined.

8.2. The North Somerset Core Strategy contains policies to support this requirement, which include Policy CS1 – Tackling Climate Change and Carbon Reduction and CS2 – Delivering Sustainable Design and Construction. The Creating Sustainable Buildings and Places Supplementary Planning Document provides guidance on complying with both of these Core Strategy policies.

9. Climate Change and Environmental Implications

9.1. Updating this SPD will contribute towards one of the key objectives in the Council's Climate Emergency Action Plan. Under the theme of 'an energy efficient built

environment' one of the aims is for 'all our new homes to be zero carbon or net carbon plus.' This supports the objective of achieving the highest possible levels of energy efficiency performance requirements in new residential development in order to reduce the emissions associated with new homes.

10. Risk Management

10.1. There is a risk that this approach could lead to some increased costs for developers potentially affecting viability and prompting calls to a trade off against addressing other policy objectives. However, overall viability of the Core Strategy was assessed as part of the examination process and this change should not affect overall viability as it simply replicates the code level 4 requirement contained in the adopted plan. Furthermore, the development industry's approach has changed since plan adoption and code level 4 equivalent is now the industry standard, and many developments now aspire to a higher standard.

11. Equality Implications

11.1 The Core Strategy was subject to equality impacts assessment. These revisions do not raise additional equalities issues.

12. Corporate Implications

12.1. The Council's Corporate Plan 2020-24 includes 'green' as one of three key themes. This emphasises the importance of bringing forward actions relating to tackling climate change as a key factor in all policy and strategic decisions.

12.2. This update will contribute to the Councils Climate Emergency Strategy and Action Plan.

13. Options Considered

13.1. There is no statutory requirement to update the SPD. We could retain the version adopted in 2015 and continue with the approach that the Council would not require Code for Sustainable Homes compliance of adopted Core Strategy Policy CS2. We could also wait until a new suite of policies are produced as part of the new Local Plan 2038, which is anticipated will be adopted in 2023. However, the Council has now declared a Climate emergency, due to the globally acknowledged urgency to act on climate change. National guidance is clear that local authorities can require an improvement on Building Regulation performance standards. It is therefore considered that the Council ought to do everything within its power to reduce the carbon emissions associated with new residential development within the district and updating this SPD would contribute towards this aim.

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Appendices:

Appendix A – Summary of responses to the consultation
Appendix B - Updated version of the Creating Sustainable Buildings and Places SPD.

Background Papers:

Planning and Energy Act 2008
National Planning Practice Guidance (2019)
North Somerset Core Strategy (2017)
Creating Sustainable Buildings and Places SPD (2015)

Appendix A – Summary of the responses received to consultation

Comments received from	Comment	NSC response	Changes to SPD
Backwell Parish Council	Backwell Parish Council supports the Creating Sustainable Buildings and Places Supplementary Planning Document (2015) Proposed update 2021 as this continues to support Backwell's own Climate focus. With the large numbers of new houses expected over the next few years the focus on increasing the energy performance of them and this will be done by using the Code for Sustainable Homes Level 4 and also that it in addition to this requirement, the Council will continue to require clause 2 of Policy CS2. Development should demonstrate a commitment to reducing carbon emissions, including reducing energy demand through good design, and utilising renewable energy where feasible and viable in line with standards set out.	Noted.	No
Backwell Residents Association	Fully supports the proposed updates to the Creating Sustainable Buildings and Places SPD. In particular, we are pleased to see that you will now require Code for Sustainable Homes Level 4 equivalent improvement in energy performance standards in all new residential development, and that you will expect non-residential proposals to demonstrate how they meet the relevant BREEAM standards.	Noted.	No
Banwell Parish Council	Overall, Banwell Parish Council supports the SPD as it brings back and enhances sustainability requirements which have been missing for 6 years. Banwell Parish Council believes the document wording should be made clearer to explicitly say the requirements will also apply to the conversion of agricultural, industrial and commercial properties and the conversion of all non-historic buildings (built after 1911).	Paragraph 3.3 and the checklist requirements have been amended to clarify that standards also apply to conversions - *In light of the NPPG clarification, the Council has reviewed its position and will now require Code for Sustainable Homes Level 4 equivalent improvement in energy performance standards in all new residential development applications, which* ***include the conversion of agricultural, industrial and commercial properties to residential use.*** *This will apply to all new applications that are registered after the date that this updated SPD is adopted.*	Yes

British Horse Society	I write on Behalf of the British Horse Society in response to the North Somerset's updated Creating Sustainable Buildings and Places Supplementary Planning Document Consultation, and in particular to Core Strategy CS1 policy requirement point 3.30 referring to active travel. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access. Nationally, it is estimated that there are 3.5 million people in the UK who ride or who drive a horse-drawn carriage. North Somerset is a popular area for both horse ownership and horse riding both at small yards and major centres, contributing greatly to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc. Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2021, the BHS received reports of 5,784 road incidents, in which 441 horses and 44 people were killed with 1,350 riders and 1,198 horses injured, with 75% of these accidents caused by vehicles passing too closely to the horse. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics) The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see https://www.bhs.org.uk/our-work/safety/dead-slow – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries). Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to	Noted, comments will be passed to our Sustainable Travel team to consider as part of the Council's Active Travel Strategy.	No

	exercise their horses. An additional factor is that the bridleway network is fragmented, and roads are often the only available links between one RoW and the next. a. Recognition of equestrians as vulnerable road users Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders." We therefore ask that the planning document includes equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists. b. Inclusion of equestrians in the Active Travel Strategy The term 'Active Travel' applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use. is now acknowledged that horse-riding is as much an 'active travel' mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that "horse riders…ought to be thought about in the context of active travel as well." This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that "Active travel includes horse riders and bridle paths – this debate includes them." Cambridgeshire and Peterborough Council has defined Active Travel as "Physically active modes such as walking, or horse riding. It also		

	includes walking or cycling as part of a longer journey." (See Cambridge and Peterborough report) c. Equestrians to be included in any shared-use routes, wherever possible In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible. Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current 'Be Nice, Say Hi!' campaign and with Sustrans in their 'Paths for Everyone' initiative. The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.) d. Reference to the Hampshire Countryside Access Forum (HCAF) guidance Equestrians in Hampshire The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.		

	Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county. We would urge the Planning Team to incorporate the principles set out in this guidance into their planning policy: most particularly, that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development. “Good growth also means providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel". Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women (which is an important consideration as women who ride feel safe to go out alone), and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative. Increasingly, mental health is becoming an important consideration. Equestrianism is a popular activity in this area of North Somerset, and one which contributes significantly to the local economy. The local equestrian community has many difficulties in finding safe access within the locality. Many issues could be addressed and resolved through good planning of future development. We hope therefore that the planning document will include policies that will support this. I have in addition attached a brief document summarising the case for the inclusion of horses on all cycleways.		

CLHP Pipeline System Ltd	Thank you for your email to CLH Pipeline System (CLH-PS) Ltd dated 12 February 2021 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.linesearchbeforeudig.co.uk, our free online enquiry service.	Noted.	No
Coal Authority	Thank you for your notification received on the 12 February 2021 in respect of the above consultation. I have reviewed the document and can confirm that the Coal Authority has no specific comments to make on the Sustainable Buildings SPD.	Noted.	No
Congresbury Parish Council	Congresbury Planning Committee noted the Creating Sustainable Buildings and Places Supplementary Planning Document was a step in the right direction and that we must make sustainable buildings.	Noted.	No
Environment Agency	The Environment Agency supports this document and welcomes its contents, and wish to make the following comments: Any new development should ensure it does not adversely impact on other features such as water quality within Source Protection Zone's or surface and groundwater. This could result in, for example, the need for further treatment of drinking water which will increase carbon dioxide footprint for this sector significantly. All such development should take place in low risk areas or mitigation put in place to offset any impacts for the life span of the development. For any new development consideration should be given to making contributions for environmental gains, either on or off-site. This aspiration already in the National Planning Policy Framework is now further supported by the 25 Year Environment Plan. This sets an expectation for development including housing and infrastructure, by all organisations and individuals, that will help deliver net gain. Natural England and ourselves would be pleased to provide advice on this topic. We particularly support energy levels and water efficiency requirements for new housing to be set up to the equivalent of Level 4 of the Code for Sustainable Homes.	Paragraph 3.26 detail added to reflect the comment on water quality. *'Groundwater may also be extracted for use, where possible and permitted by the Environment Agency. New development should however ensure it does not adversely impact on water quality within Source Protection Zone's or surface and groundwater. This could result in, for example, the need for further treatment of drinking water which will increase carbon dioxide footprint for this sector significantly. All such development should take place in low risk areas or mitigation put in place to offset any impacts for the life span of the development.'* Responding to the 25-year Environment Plan through local policy will be done through Local Plan 2038. Paragraph 4.14 has been removed. Paragraph 6.11 – added bullet reflecting unsuitability of some ground infiltration SuDS on brownfield sites.	Yes

	We support the concept of Water Sensitive Urban Design (WSUD), which is woven throughout the SPD. The following CIRIA guidance document provides useful additional information on the concept and how to apply it in urban planning - wsud_ideas_book.pdf (susdrain.org) In addition, please note the following comments in relation to the specific chapters: Renewable and Low Carbon Energy Generation (page 34) 4.14 Hydropower Under the Environmental Permitting (England and Wales) Regulations 2010 permission from the Environment Agency may be required should any site/ infrastructure works take place in, under, over or within 8 metres of the bank top of a designated main river. This would include dams, sluices, weirs, structures as part of a hydropower scheme. Sustainable Drainage Systems (SuDS) (PAGE 38) Please be aware that some ground infiltration SuDS will not be suitable in brownfield sites due to the increased risk of creation of contaminated water pathways. Other SuDS solutions should be sought in this eventuality. Climate Change Adaption Measures (PAGE 43) 7.1 The SPD states the design life of a new dwelling is a minimum of 60 years and for a new industrial building is a minimum of 30 years. Please note that in accordance with the NPPF the lifetime of development for residential development is 100 years and for commercial is 60 years. Climate change should be taken into account for this time period. Finally, it is recommended that the LPA should use the most up to date and ambitious targets and best practices in support of the SPD.	Paragraph 7.1 - the design life has been changed from 60 to 100 years for residential and 30 to 60 years for non-residential.	
Highways England	Thank you for consulting Highways England on the updated Creating Sustainable Buildings and Place SPD.	Noted.	No

	We have reviewed the proposed updates and have no comments to make.		
Land Value Alliance (LVA)	LVA is promoting land to the North of Nailsea for up to 600 dwellings and 2Ha of land for non-residential uses (see plan at Appendix 1). LVA has instructed JS Lewis Ltd, an energy consultancy service, to inform the low carbon and sustainability concept of the proposed development and ensure that future development is able to meet North Somerset's standards as set out in the draft CSBP SPD. Across sites in the South West, LVA is pioneering some very demanding CO2 reduction standards through innovative onsite and near-site solutions and is looking to achieve something similar for the land to the North of Nailsea. LVA supports the Council's aims of addressing the challenges of the climate emergency and creating a sustainable future. These aims are also integral to LVA's approach to land development. The wider ambitions of the reworked SPD are also supported. Specifically, regarding the measures to introduce Code level 4 energy standards into Policy CS1, this would require a 19% improvement over Part L 2013 of the Building Regulations. We would expect to exceed this target with our focus on low and ultra-low carbon development. Further, the ongoing aim of supporting onsite renewable energy through the 10-15% policy is also aligned with our approach, and we would support its continuation, and its flexibility regarding different technologies and how they relate to different scales of development. Again, we would expect to exceed this standard. With regarding to BREEAM, we would agree with concerns raised regarding the assessment process, which has become overly bureaucratic, very expensive, poorly administered and confers less benefit	Paragraph 10.7 reflects the potential issues associated with BREEAM certification – *Where a successful case has been made demonstrating non-viability in meeting the required BREEAM standards, it may be permissible for applicants to apply a lower standard or potentially utilise alternative strategies. These will be assessed on their merits at the planning application stage.*	No
Livewest	LiveWest welcomes North Somerset's consultation on the Creating Sustainable Buildings and Places Supplementary Planning document and commends North Somerset's commitment to climate change. With local councils declaring climate emergencies across the South West and, as the largest housing provider in this region, we have renewed	Paragraph 7.4 – measures to avoid overheating. Amended the relevant bullets to now read: *•designing the building and its internal layout to enable passive ventilation measures, such as cross ventilation,*	Yes

	our environmental commitments in order to embed sustainability across our organisation and to assist our local authority partners such as North Somerset, to achieve the goals outlined in their Creating Sustainable Buildings and Places Supplementary Planning document. Our commitment is to reduce the environmental impact of our activities and to create a clean and sustainable future for our customers, employees and our families. LiveWest recognise that climate change has a significant impact on the health, safety and wellbeing of all of us. As an organisation that manages more than 38,000 homes, we recognise that our existing stock is our biggest impact on the environment and, indeed, most of the homes that will be standing in 2050 are already built. We have committed to improving our homes to Energy Performance Certificate (EPC) band C by 2028, which is two years ahead of the government target. We have also made a commitment to deliver new homes within our control above current building regulations with enhanced building fabric and renewable technology. LiveWest are building 7,000 new homes across the south west region over the next 5 years, and investing £2billion and sustaining 6,500 jobs in the building and supply chain over the next 10 years. LiveWest is keen to work and partner with North Somerset wherever we can to ensure that we can deliver a sustainable home for everyone. In order to provide a response on the Creating Sustainable Buildings and Places Supplementary Planning document I have responded to each section under its own sub-heading. **Energy Use, siting, orientation and overheating** - We are pleased that North Somerset Council has a strong agenda about responding to climate change and that it proposes several amendments to existing policies alongside introducing new policies on residential development.	*<u>which will</u> include operable windows, a shallow floor plan, high floor to ceiling heights, a double façade.* *•selecting the most energy efficient ventilation and cooling systems – avoiding traditional air conditioning systems <u>which will increase energy demand</u>* In relation to the comment on specifications for pipework, radiators, cylinders specification and water consumption targets, we can consider this in the context of the Local Plan 2038 and related documents. Paragraph 3.23 has been amended to read: *'A large proportion of water used in homes does not need to be of drinking quality. Implementing measures to reduce water use, including water efficiency devices (water saving taps and showers, low flow toilets, water efficient appliances) and rainwater harvesting through using a tank to collect water or re-using water via greywater recycling should all be considered'* Biodiversity Net Gain and the Environment Bill – the Council will develop policy in Local Plan 2038 to fulfil this requirement. Renewable Energy Generation, whilst the points about PV and heat networks are noted, the Council does not specify the type of renewable energy generation to be used to meet local policy requirement. Para 3.32 of Core Strategy CS2 states: *Policy CS2 '..does not prescribe the type of renewable energy for individual applications but instead advocates that a range of technologies be explored choosing the one that gives the best environmental performance, is cost efficient and has no adverse impacts on the surrounding area. Geographical location of various technologies.'*	

	LiveWest fully supports North Somerset Council in setting an approach to encourage development to follow the energy hierarchy and to prioritise energy reduction through good fabric, siting and orientation principles. We also agree that assessing measures to avoid overheating is essential and would recommend that passive measures such as **cross ventilation are promoted over technical solutions that may increase energy demand**. This should absolutely be required prior to looking at the installation of renewable and low carbon systems. Through extensive modelling undertaken by LiveWest we have found that where the dwelling fabric is not sufficiently robust the in-use running costs for electric-based heating systems can often be double the level of an A-rated gas boiler. Therefore, whilst achieving the carbon reduction requirements under SAP these can increase the running costs to our customers which could increase the incidences of fuel poverty. For properties constructed prior to the 2025, even with a robust building fabric and domestic scale renewable, gas remains a cheaper fuel source for our customers. In order to future proof our properties to avoid expensive retrofitting later we ensure that where gas boilers are to be installed the heating system design must facilitate a retrospective heat pump installation. As a minimum the contractor must provide internal pipework and radiators to allow heating demands to be met at 40 degrees flow and allow space for a suitable sized water cylinder within an internal cupboard. LiveWest would encourage North Somerset Council to consider adopting a similar policy which would ensure homes built today are fit and adaptable for tomorrow. Water - LiveWest supports the requirement to demonstrate water efficiency measures to reduce demand on water resources. We would encourage North Somerset Council to adopt a target water consumption of no more than 110 litres/person/day through the incorporation of water saving measures where feasible. In our experience this target is best achieved by restricting in-use consumption rather than through grey water systems which creates higher maintenance costs.	To inform Local Plan 2038, the council has commissioned updated evidence which will identify the most suitable locations for a range of technologies. The Renewable Energy Resource Assessment Study will be published on the Council's website. Modern Methods of Construction – the Council will consider this as part of the Local Plan 2038.	

	In 2015 the NHBC published data on the experience of housing associations and customers with sustainable technologies, including technologies for reducing water consumption. The water efficiency systems with the highest satisfaction levels were low flush toilets and low flow taps and showers, with grey water recycling systems having the lowest levels of satisfaction. Through our own experiences we agree with these findings and would encourage North Somerset Council to promote measures to reduce consumption ahead of other water efficiency systems. Reducing surface water run-off, land use ecology, green infrastructure and tree planting (including CS2 policy requirements) LiveWest fully supports North Somerset Council in setting out your requirements for reducing surface water run-off. LiveWest views sustainable urban drainage systems is an important multi-functional feature in our communities and accessing outdoor spaces and being close to nature has never been more important. LiveWest are committed to promoting sustainable landscaping design, including edible landscaping, wild meadows and wildlife corridors, through design on our new build estates and re-wilding on our existing green spaces where appropriate. We welcome the publication of North Somerset Council's Green Infrastructure strategy. LiveWest has completed a tree inventory, quantifying the economic benefits and values of trees and other green infrastructure. This project allows us to quantify that the trees under our management store over 3,600 tonnes of CO2, with a further 109 tonnes sequestered every year. Where any trees need to be removed from our sites, we have committed that we will replace this on a two for one basis. The requirement for 10% biodiversity net gain is expected to be a mandatory requirement when the Environment Bill is enacted and it would be important for North Somerset Council's policy to be consistent with this.		

	Sustainable and active travel - LiveWest support North Somerset Council in promoting non-car transport options within our new developments. The LiveWest approach when designing new housing schemes is to ensure good connectivity to existing cycle and footpath networks and to prioritise non-car transport for local journeys by enabling greater connection through our new schemes. As such safe and secure cycle storage facilities, for each property, are specified on all of our developments. Renewable and low carbon energy generation - LiveWest supports North Somerset Council's ambition with this policy and commend North Somerset Council for recognising that the principles of energy hierarchy should be followed, and the total energy demand of a building should be prioritised through energy efficient measures, ahead of the installation of renewable and low carbon energy generation. Whilst we recognise that North Somerset Council have an open approach to renewable energy systems, we would recommend that where renewable systems are required photovoltaic systems (PV) should be named as the preference and that battery storage should be promoted in order to allow residents to realise the full benefit from the electricity generated from the PV system. The NHBC paper on sustainable technologies in May 2015 showed that PV achieved high customer satisfaction levels, which combined with good scope for ease of install and perceptions of low user involvement with controls confirms a preference for this technology. LiveWest have experience of developing schemes that utilise a decentralised heat network. Our experience in delivering housing schemes in this manner is that a critical mass, often in excess of 2000 homes, is required in order to ensure that capital costs of this heat network are viable. In most instances where these district heating systems have been delivered there is often a level of public subsidy. Decentralised heat networks are currently an unregulated sector. As a social housing provider, we are focused on supporting our customers		

	and protecting them from fuel poverty associated with rising energy bills and the potential for disconnection in the event of payment default. LiveWest would encourage North Somerset Council to develop policies in order to offer greater protection to customers who purchase properties where district heating systems are present. Where North Somerset Council are looking to promote wind turbines, or commercial solar farms, geothermal power and hydropower, we would ask North Somerset Council to carefully consider the geographical location of renewable generating and distribution networks so that they do not impede on either the expansion of existing settlements or creation of new residential settlements. This should take into account future housing beyond existing consented schemes or schemes within the planning system and should be mindful of future allocations given consideration to a 15-20 year period. A holistic view needs to be taken on the future provision of residential and commercial developments and the generation and supply of renewable and low carbon energy in order to ensure a sustainable built environment. Modern Methods of Construction - We note that there is no mention of Modern Methods of Construction (MMC) within these policies. LiveWest has a good history of using modern methods of construction systems, whether these are rainscreen cladding systems, panelised or volumetric construction systems. We see that MMC will have an increasingly important future role to play in the housing sector in terms of increased delivery, waste reduction and improved environmental performance. LiveWest is a board member of Building Better which is a strategic alliance of housing associations supported by the NHF. Our aim is to encourage collaboration across the social housing sector in order to realise the true benefits of MMC in terms of quality, sustainability and better value. We would happily discuss our approach with North Somerset Council if that is of benefit.		

Nailsea Town Council	Nailsea Town Council agrees in principle to the proposals outlined in the Creating Sustainable Buildings and Places in North Somerset document but request clarification from NSC that their own development on The Uplands will comply with Sustainable Homes standards Level 4 or higher.	The energy statement for Uplands states that: it would seem feasible for all homes to meet the Future Homes Standard of an 80% reduction below Part L1A. Therefore, the scheme is in excess of the Code 4, where this is equivalent to 19%.	No
Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England understands the Creating Sustainable Buildings and Places SPD is being updated to reflect changes to NPPF and national government advice on the Code for Sustainable Homes, to support the aims of the Climate Emergency strategy, and to provide more detailed guidance about Core Strategy Policy CS1: Addressing Climate Change and Carbon Reduction and Core Strategy Policy CS2: Delivering Sustainable Design and Construction. The SPD update proposes to require proposals for new residential development to demonstrate it will meet the Code for Sustainable Homes Level 4 or equivalent. We note that this requirement will be in addition to the existing requirement for new residential development to meet 10% to 15% of its predicted energy use through renewable and low-carbon energy generation. The BREEAM 'very good' or 'excellent' standards (or equivalent) will continue to apply to non-residential development. In principle Natural England supports the requirement for all new development to meet the highest standards to ensure its operational and embodied carbon and energy use is minimised as far as possible, provided significant ecological or landscape impacts are avoided or mitigated, and it results in a net gain in biodiversity. As noted by Defra in its consultation on five legally binding principles to guide future policymaking to protect the environment, there is no pathway to tackling climate change that does not involve the recovery and protection of nature. The SPD update should help to ensure these requirements are	Noted.	No

	applied at the design, construction, operation and decommissioning phases of residential and non-residential development. Natural England also notes and welcomes the frequent references to green infrastructure in the SPD update, which reflects its wide-ranging role in creating sustainable homes and places that are resilient to the effects of climate change. Natural England regards green infrastructure as being essential to achieving sustainable development, which alongside other types of supporting infrastructure like transport, power, water and sewage, should be properly planned from the outset. With this in mind, we are pleased to see references in the SPD update to the emerging North Somerset Green Infrastructure Strategy, which we note is intended to set out the strategic Green Infrastructure network within North Somerset and provide the framework for improving connectivity, quality and overall provision of Green Infrastructure for both people and wildlife in North Somerset. Natural England has been consulted on the draft green infrastructure strategy and we will provide comments on this separately. More generally, we think the additional detail being proposed in the SPD update to support the Core Strategy policies and related objectives, and the cross referencing and links to other relevant policies, standards, strategies, studies etc, including for green infrastructure, should help to ensure an integrated approach is taken to planning and providing new development in North Somerset.		
North Somerset Internal Drainage Board	The North Somerset Levels Internal Drainage Board's District is a designated area of special drainage need due to the land being drained by a network of interconnected watercourses. These watercourses, known as rhynes, have little gradient and not only do they drain the land, but the levels are also carefully managed, and they supply water for agriculture and biodiversity reasons. The source of the water is partly from springs in the Mendips. The Board is concerned that new development may impact on its District by both increasing the volume of water entering its District in times of heavy rainfall and the lack of water during drier	This is interim guidance to support Core Strategy (2017). New policy and supporting guidance, including detail on flood risk resilience, will be provided in Local Plan 2038. The updated SPD does refer to policy CS1, which requires *'Areas will be enhanced to be resilient to the impacts of climate change including flood defence and public realm enhancements including the integration of effective shading through, for example, tree planting'* (clause 10).	No

	periods, especially in times of drought. A lack of water may adversely impact on the status of SSSIs in the Board's District. The following comments are made with the above in mind. The Board is pleased that an update is proposed to the Creating Sustainable Buildings and Places Supplementary Planning Document (2015), however the proposed update is not ambitious or as visionary as it should be for a document that will support development until 2038. The areas of concern for the Board are how to mitigate and adapt to the impacts of climate change. The latest evidence from Intergovernmental Panel on Climate Change (IPCC) and the UK's Met Office predict that a certain amount of climate change is inevitable, regardless of any reduction in emissions from new development or dwellings achieving net zero carbon. These highly likely changes to the climate by mid-century are: Source Climate Change Committee 2020 The four main impacts of climate change will be higher temperatures, increased sea level rise, heavier rainfall and increased likelihood of drought. This will adversely impact people, places and the natural environment without adequate mitigation and adaptation. How new developments in North Somerset will adapt to these conditions is not sufficiently detailed in the proposed amendments to the SPD. The Environment Agency published a revised National Flood and Coastal Erosion Risk Management Strategy for England in 2020. The focus of the strategy is the creation of climate resilient places, be this adaptation of existing places or the creation of new places. This will require changes to how places are designed and constructed. The Board's interest is focused on the water cycle and the aquatic environment. The transition to climate and water resilient places requires a holistic approach to the design of the new developments, resilient measures should be at a landscape scale as well as a property	Paragraph 7.2 requires: All sustainability/energy statements should contain detail on how changing climatic conditions have been considered as part of the design of the development. Adaptation referenced in the checklist, with a requirement for: Details on adaptation measures must demonstrate: • Flood resilience measures • Methods to avoid overheating • Measures to minimise the Urban Heat Island Effect • Measures incorporating green infrastructure and rewilding This will be considered further through the development of the Local Plan 2038.	

	scale and incorporated into the hard and soft landscaped areas of new developments. The importance and complexity of the flood risks to North Somerset is such that the subject cannot be adequately covered by a single chapter in this SPD and the subject requires its own SPD. The Board recommends that a Water and Flood Resilient Places SPD is created to build on and provide further detail to the subject and provide applicants with details of what is required to be provided to demonstrate that core policy requirements have been met and how to achieve the requirements for different scales of development.		
Persimmon Homes Severn Valley (PHSV).	PHSV have a number of developments and continue to provide homes within the North Somerset administrative area and are committed to delivering sustainable development and are well placed to provide constructive input into the 'Creating Sustainable Buildings and Places SPD'. PHSV would be pleased to engage positively with the Council to discuss the practical implications of the SPD. PHSV welcomes the update to the SPD and supports the Council's reference to the Planning Practice Guidance and that development should demonstrate compliance with an energy performance improvement above Building Regulations, equivalent to Code Homes Level 4. The comments raised are specific to paragraphs within the SPD. Draft Consultation Point 5: This should be clarified that the Council will require Code for Sustainable Homes Level 4 equivalent improvement in energy performance standards in all new residential planning applications, and for clarity a new application is outline or full application and not reserved matters planning applications. The reason for this clarification is firstly reserved matters planning applications are not new applications, and secondly land purchases, viability assessments, s106 agreements are all based on the policy	Paragraph 3.3 and point 5 of the reason for updating the SPD. Amended to clarify that the Code 4 requirement applies to all **new residential planning applications** including conversions. Paragraph 1.4 reference to NPPF has been amended from 149 to 148. Paragraph 3.16 - added wording at start to address point about siting and orientation: *'Where possible and where it would not impact on the efficient use of available land, it would be advantageous for the main orientation…'* Paragraph 4.3 – whilst this paragraph reinforces the principles of the energy hierarchy, it should be noted that renewable energy generation will be required alongside energy efficiency measures to demonstrate a 19% improvement on Building Regulations Part L1A. Point 7. *In addition to this requirement (code 4 equivalent), the **Council will continue to require** clause 2 of Policy CS2, which is for new residential development to provide between a minimum of (underlined) 10% to 15% of the predicted energy use (depending on development size), to be met through*	Yes

	position and parameters set out the time of determining the planning application. Paragraph 1.4: For accuracy I believe the reference is to paragraph 148 of the NPPF. Paragraph 3.3: The comment on Draft Consultation Point 5 is repeated for the purpose of this paragraph. Paragraph 3.16 and 3.17: Whilst solar gain should be maximised, it needs to be considered in the planning balance. Site constraints, providing a balanced layout etc. could all have an impact on whether the main orientation of a plot, or its garden can be south or within 30 degrees of south. This paragraph needs to reference that solar gain should be maximised, where practicable within the context of the site. Paragraph 4.3: this paragraph is welcomed. It should be clarified that the Council is not seeking a 10% or 15% (depending on the site) above the Code Level 4 requirement if Carbon reduction is achieved through fabric improvements. Currently as the policy is written a 10% carbon reduction could be achieved through fabric improvements and a further 15% reduction required via renewable energy which would exceed the 19-20% Carbon reduction required to achieve Code Level 4. Paragraph 8.11: it needs to be clear that this SPD is not setting a policy requirement to achieve zero carbon standards. The Future Homes Standard is not prohibiting local policy introducing local zero carbon standards, but this needs to be done through a Local Plan which is also subject to viability testing and examination. This SPD does not meet the above criteria, the confusion comes with the cross reference to section 10 (viability) within the SPD, which refers to site specific viability testing. It needs to be clear that this SPD is not requiring every application to provide a viability assessment to demonstrate that zero carbon standards cannot be achieved, this would not currently comply the Planning Practice Guidance.	*renewable and low carbon energy generation – this is detailed in Section 4.* Paragraph 8.11 – it is considered to be very clear that the SPD is not setting a policy standard to achieve zero carbon standards and any changes to local policy will be considered through the Local Plan 2038. Viability Assessments will not be required to demonstrate that zero carbon standards cannot be achieved. This SPD guidance will be reviewed once the planning changes to Building Regulations Part L are confirmed.	

	Section 12: It is considered that the SPD should be reviewed in line with any changes to Building Regulations Part L that come into effect. We would be grateful if you would take these comments into account in producing the next version of the Creating Sustainable Buildings and Places SPD and keep Persimmon Homes Severn Valley informed of its progress.		
Portishead Town Council	Portishead Town Council fully supports the proposals.	Noted.	No
Wanderlands	We broadly support the direction of travel of the SPD and have been working with our landowners to encourage a move rapidly to zero carbon new housing in respect of development on their land and to seek ways to extend mitigation for the carbons in the construction phase. As part of this process we have a strategic alliance with Wonderlands in respect of establishing developments carbon footprint and providing a viable way of offsetting these emissions. I am attaching a document produced by Wanderlands and would like this to be considered as a formal submission to the SDS consultation.	Noted.	No
Weston Town Council	SUPPORT this proposal.	Noted.	No
Winscombe and Sandford Parish Council	Even though Winscombe and Sandford Parish Council's Planning Committee support North Somerset Council with them continuing to require new residential developments to provide between 10% to 15% of the predicted energy use (depending on development size), to be met through renewable and low carbon energy generation, it is felt that this is not enough and that it should be at least 25%. In addition, developers should provide renewable and low carbon energy generation as standard in all of their new properties and should not expect new buyers to put it on/in as an added extra, potentially with additional costs.	The renewable energy generation requirement is Core Strategy Policy and cannot be changed at this time. New policy for Local Plan 2038 will consider the potential to set higher standards.	No
Wrington Parish Council	Page 2, Para 2 refers to the aim “for all new homes to be zero carbon or net carbon plus”. This requires a clear and precise definition of “net zero and net carbon plus along with robust assessment and audit processes. Current proposed developments in NS are claiming to be	2. – the definition of net zero/carbon neutrality will be considered in the Local Plan 2038.	Yes

	"Zero Carbon" however this is only referring to operational energy or sometimes just regulated energy which is only a fraction of the total carbon emissions of a new building. Page 2, Para 5 Code for Sustainable Homes level 4 for energy required when this SPD is adopted. This is currently the maximum a local authority is allowed to require however this is woefully inadequate if significant improvements to be made. The current revision proposals for Part L are not much better and will not push performance even close to Net Zero Carbon. **Introduction,** Page 11, 1.5 "Effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development." This is critical but at all levels, however it is important ESPECIALLY at site level where the site layout and dwelling arrangements/orientations are critical to better performance. Page 14, 2.8 "Paragraph 131 of the NPPF states that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings." It is extremely important that there are opportunities for many more small companies, community groups and individuals to be allowed to show innovation. Established and dominant development companies tend to stay with old solutions and technology and are highly risk averse to new ideas. Page 15 NPPF Planning guidance (2019) "Different rules apply to residential and non-residential premises. In their development plan policies, local planning authorities:	Paragraph 2.8 - a self-build policy will be developed for the Local Plan 2038. Paragraph 3.7 has been reworded to emphasise staged approach of energy hierarchy and amalgamated detail contained in para 3.8. Paragraph 3.12 - the government is consulting on the role of Building Regulations in addressing overheating in new residential buildings. New local plan will consider this issue. Paragraph 3.13 - removed reference to natural ventilation through chimneys and reference to conservatories. Paragraph 4.12 has been removed alongside the other paragraphs detailing 'issues to consider' with other technologies. Paragraph 7.4 – Measures to avoid overheating. Additional climate change adaptation policy will be considered. Bullets relating to summer cooling through natural ventilation, avoiding designing small south facing buildings and using smaller windows on the south and western elevations with low u-value glazing have been removed. Paragraph 8.15 – removed the final sentence: *'This is likely to be a more costly approach and technically more difficult to achieve on some sites compared with the other two approaches.'*	

	• Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes. • Are not restricted or limited in setting energy performance standards above the building regulations for non-housing developments." It seems ludicrous that higher standards are not allowed for dwellings where they are for non-housing developments. Page 20: Using the Energy Hierarchy. 3.6 and 3.7 The issues regarding building envelope should also be included in 3.6 as the second stage before the provision of renewable energy. It is far critical to reduce total demand by building better fabric prior to applying renewables and as such it would be beneficial to allow a lower renewable requirement for dwelling constructed to a fabric standard higher than required under Code Level 4. 3.8 "all new buildings should be built to perform to the highest possible efficiency." Unfortunately, although they may be efficient in design there is a huge performance gap due to post design changes, lack of onsite quality assurance, poor building and error. Without an inspection and enforcement regime that can identify such shortcomings this will inevitably continue. Page 21 Passive Design and minimising overheating risk 3.12 "Assessing overheating is therefore an important part of any design process." This is extremely important as overheating is a large and growing problem however assessment using SAP (which is NOT a design tool) is inadequate and inaccurate and requires addressing with better and suitable methods.		

	3.13 “Natural stack ventilation through chimneys” This is completely out of step with modern low energy design. Chimneys create significant uncontrolled ventilation which is not a good thing. Chimneys cause huge ventilation losses in winter and along with wood stoves which reduce air quality should be made obsolete. “Conservatories and sun spaces that can capture passive solar energy.” This is also bad advice out of step with good design. Such elements are “old technology” from the last century that cause far more overheating problems than benefits of winter solar gain. Solar gain has to be managed on a whole house basis and assessed properly during design from day one. Thermal Mass - can help however in well-designed lightweight buildings this can be much less important and is usually the largest source of embodied carbon in the fabric. Design out thermal bridges - This is critical however the current Accredited details system is not fit for purpose in delivering this as the details are poor but more importantly with lack of inspection and other ways of certification AD’s can easily be claimed even if not employed. Page 26, Issues to consider with the use of Mechanical Heat Recovery systems: • A low carbon, rather than renewable source of heat MVHR is NOT a heating system, it is a ventilation system that reduces heat loss and may help stabilise and even out temperatures through the building. As such it is a key part of a low energy design but only if used in tandem with high efficiency fabric airtightness. • It uses electrical energy to operate, this is only likely to benefit in reducing the energy in larger homes This is incorrect and misleading. This can be highly beneficial in all suitably airtight buildings, regardless of size. In a building with airtightness below 1.0 m3/m2hr it can save about 15x the energy it consumes.		

	7. Climate change adaption measures Page 35, 7.3 Issues of overheating. Overheating is becoming the biggest health and comfort issue in new dwellings and will get a lot worse as the climate warms. Knowledge and understanding of this in the architecture and construction sectors along with design stage assessment and mitigation are woefully lacking in most new dwelling designs Page 36. There are several misleading and incorrect statements here. • Maximising summer cooling through natural ventilation Not enough alone and this option is often not available when occupants are out, and windows need to be closed for security • avoiding designing small south facing buildings This is wrong. While designing buildings with a lot of south facing glazing without OH assessment and mitigation will almost certainly lead to overheating however any large or small building PROPERLY DESIGNED with suitable shading and ventilation needs to be south facing to benefit from winter solar gain for lowest winter heat demand • using smaller windows on the south and western elevations with low u-value glazing This is again not wholly correct. Correctly designed and shaded south windows are a benefit. East and West glazing should be limited and also correctly shaded (much harder!) All glazing should have a low U value especially on the north where there will be higher heat losses and no solar gain. What is more important is the selectin of low G value glass in East and West windows. • designing the building … high floor to ceiling heights… This should not be necessary. High ceilings (over 2.5 m) waste space and so increases heat loss per m2 floor area. Page 38- 8. the Future Homes Standard and future Zero carbon policy 8.2 FHS proposed option 1 giving a 20% reduction in Carbon emissions. This proposal is woeful inadequate and requires much better insulation standards and airtightness.		

	8.3 FHS proposed option 2 “Fabric plus technology” This is a very poor option that will result in the dropping of high fabric standards that lock in efficiency for life in favour of renewables which are short lived and may fail. Most critically, whatever standards are contained in the Part L revision, they will not lead to the planned improvements in energy standards without robust assessment audit and testing none of which are provided for in the building regulations. 8.8 “The Future Homes Standard is the national stepping-stone to national Zero Carbon policy 2050. However, if it can be demonstrated that local zero carbon standards are achievable…This is achievable now with several design and construction techniques being pioneered by some construction innovators. However, the dominance of larger commercial developers, who have little desire to change construction methods, is the biggest barrier to seeing these standards demonstrated and adopted. 8.1. Balanced approach: fabric performance at Fabric Energy Efficiency Standard (FEES) level, focusing on renewable and low carbon technologies. This achieves overall emissions at or below the carbon compliance level. The remaining emissions are met through allowable solutions. This is a poor option. 8.2. Extreme fabric approach: with fabric performance significantly higher than the FEES, high efficiency is achieved with little or no renewable energy. This will have overall emissions at or below the carbon compliance level, again the remaining emissions are eliminated via allowable solutions. The Passivhaus standard[1] is an example of this. This is the best option. 8.15 “Extreme Low Carbon Technologies: This approach uses only fabric and on-site energy solutions (no allowable solutions) it therefore relies on high fabric performance (considerably higher than FEES) and extensive use of sustainable technologies (to		

	beyond the carbon compliance standard). This is a highly aspirational approach. This is likely to be a more costly approach and technically more difficult to achieve on some sites compared with the other two approaches." This is not correct It is quite possible to achieve Net carbon plus using VERY good fabric and simple tech i.e. Solar PV, MVHR and direct electrical systems. This can be done a minimal addition al cost of around 6% currently which is more than offset by energy savings over a very few years of operation. 9. Retrofitting, Page 41, 9.4 Internal wall insulation This option must be "handled with care" to avoid the dangers of interstitial condensation, mould growth and respiratory		
Wrington Village Alliance	1. pleased to see a policy document to support the climate change emergency announcement. 2. Sad to see the documentation is so long. It should be cut back to be clearer without losing impact. Too much of it reads like a textbook e.g. "issues to consider....." on page 33. It will then be easier to follow and enforce. Currently it will confuse some smaller house builders. 3. Electric vehicle charging in new housing has not been adequately considered. As an EV owner it is clear there are currently too many types of charge point to suggest developers should install them. What should be a requirement however is that on all new houses a separate 10mmsq three core wire and earth cable should be installed from a separate way on the distribution board to a blank socket on the front outside of every garage or on a post near each parking area. 4. I like the requirement for 10% or 15% on site renewables. Please include a similar requirement for underground rainwater harvesting tank of a defined size connected to an external tap in the main garden area of every dwelling with a garden. Currently it's too vague with text talking solely about encouragement.	2. Paragraphs 4.10 to 4.17 have been removed. Agreed that these technologies are now more widely understood. 3. EV charging is covered in Parking Standards SPD guidance. Setting new standards for EV charging will be considered within the context of the Local Plan 2038. 4. Paragraph 3.22 details that rainwater harvesting should be considered to reduce water use, but this cannot be mandated as this is not specified through policy CS1.	Yes
Individual	Fully support the policies contained therein.	Noted.	No
Individual	I think that the cumulative effect of the stated aims could deter small developments, few points noted are below - 7.4: Don't encourage the use of plastics that need fossil fuel to manufacture them	Paragraph 7.4 - Section relating to material use, in paragraph 3.12 added the sentence *'The use of plastics and other synthetic materials should be minimised.'*	Yes

	7.5: South facing windows are ok if amount of glass is limited, it actually helps in the winter. Highly U value south glazing will reduce solar gain so counterproductive in winter, in summer open the windows and have passive ventilation 7.6: Planting trees on low lying fields that are too wet for arable of for all round grazing for livestock, e.g. parts of Tickenham moors, re-wilding? Ensuring that footpaths across private land are kept accessible all year round, e.g. cattle management, stile/gate management, general accessibility. Don't allow developments that rely on surface water run off onto roads (e.g. the former Golden Acres site) 7.7/ 7.8: Tree planting rewinding low lying areas liable to flooding (as above) 10.0: it's important that the Viability Assessments are adhered to particularly for one-off and self-build otherwise it would deter small developers and self-builders. It should not be down to the applicant to make a justification case for one-offs, there should be a standard assessment process that can be completed online with minimum requirements in such cases. In such cases it's important to avoid any undue burden being placed on the applicant that might present an unreasonable barrier. Such a barrier might be the requirement of expensive professional reports, one-off new builds should be encouraged, and the application process made easy in line with government thinking. Summary - There seems to be too much red tape here, too many potential hurdles that could become barriers to small developments. Any such policy should be approved at government level to ensure that it is fair to all and does not overly impact one-off and very small developments.	Paragraph 7.6 – we cannot change this wording, as it is taken directly from the Core Strategy policy. However, tree planting is part of the Council's re-wilding and green infrastructure strategies. Paragraph 7.7 – no change made Paragraph 10.0 - A standard viability assessment process will be investigated as part of the adoption of the SPD. Applicants can discuss viability concerns when submitting planning applications. The principle to viability states: *'Where a lack of viability is demonstrated, the Council will take this into account in its decision making'* Summary - A self-build policy will be developed for the Local Plan 2038.	

	The whole process of planning permission for small developments needs streamlining not making even more onerous.		
Individual	I support the energy efficiency measures proposed in the Creating Sustainable Buildings and Places Supplementary Planning Document (2015) Proposed update 2021.	Noted.	No
Individual	Most desirable to take steps to reduce carbon footprint in our area. Agree with the proposal that new residential properties should demonstrate that they have made the savings and changes indicated in this document. As residential properties are only part of the reason for this change it seems to me that all other properties - commercial/local authority/ hotels and other hospitality services - should adopt the same measures. It would also seem sensible to consider promoting this level of reduction across the whole property portfolio providing incentives to reach these standards in older properties where possible.	The BREEAM requirement, which is detailed in Section 5 of the SPD does impose sustainable design building standards on non-residential/ commercial properties. The need to address standards in existing/ older properties will be considered as part of the Climate Emergency strategy and action plan.	No
Individual	I hope that North Somerset Council takes this opportunity to make a real difference to creating sustainable housing by insisting that developers put solar panels on roofs. I don't know what the current policy is on builders including them, but a housing development in Winscombe has only two per roof. This is not nearly enough - we have fourteen on our bungalow. It is even more important to put as many solar panels as possible on affordable housing as these residents will be the ones who can least afford expensive electricity bills. It is not unreasonable to developers to put on the maximum amount the roof can take. It is not expensive, ours cost £5,000 and a developer putting them on during the building stage would be able to do it significantly cheaper than that. It could also start a new industry in this country. Currently panels are made either in China or America, but it would be better for the economy if they were made in the UK.	The current renewable policy energy requirement is between 10% and 15% (depending on development size) of the predicted energy demand of a dwelling to be met through renewable energy generation. The SPD guidance supports current policy and cannot impose new policy standards. New local policy in Local Plan 2038 will consider the potential to set higher standards.	No
Individual	Paragraph 3.16 - This paragraph should be re-written to provide greater clarity and flexibility for development; constraints such as existing topography and land contours, available land and the orientation of	Paragraph 3.16 - amended to include the wording as recommended. '*Where possible and where it would not*	Yes

	existing development may limit the ability and opportunity for new buildings to be orientated within 30° of south. Indeed, were this direction to be followed as written, there is potential that it could result in the inefficient use of land identified or allocated for development. This could lead to further land being required, or worse, unplanned, speculative development coming forward to contribute any shortfalls in housing delivery targets. A suggested rewording is provided below (suggested changes in bold italics): Where possible and where it would not impact on the efficient use of available land, it would be advantageous for the main orientation of a building to be within 30° of south. Buildings oriented south-east will benefit from the morning sun and those south-west will benefit from the late afternoon sun. Optimising the orientation and pitch of a roof to maximise sun and daylight exposure will also benefit the energy that can be gained from solar panels located on the roof. Paragraph 4.5 - 6th bullet point. Should this read: Wastewater heat recovery systems Paragraph 8.11: The inclusion of this paragraph should be re-considered. The Future Homes Standard, due to come into force in 2025, will require sweeping changes to the construction and heating technology of new homes. These changes will include increased pre-fabrication and other modern methods of construction (to achieve the required airtightness standards) as well as new heating technologies (heat pumps, district heating networks, etc) and even with these technologies, it is and will continue to be challenging to achieve the 75-80% reduction in carbon dioxide emissions. There is no need to pre-empt this further as the timescales align with the Council's target of 2030 for carbon neutrality.	*impact on the efficient use of available land, it would be advantageous for the..'* Paragraph 4.5 - amended to read Wastewater Heat Recovery Systems Paragraph 8.11 - will be retained to provide context for policy considerations for Local Plan 2038. Local policy standards will need to be consistent with national policy.	
Individual	I believe climate change is the biggest threat we as a species have faced and we should all do as much as we can to tackle it. Some measures are easy for individuals to implements and others very difficult and these need the assistance of government or companies etc. I support all new builds being as energy efficient as possible as this	Noted.	No

	should reduce the costs of the measures due to economies of scale. I also support measures to enhance wildlife and biodiversity.		
Individual	The document seems to be reasonably comprehensive, but I have the following comments: 1. I don't see how it's possible to achieve an absolute zero carbon standard by 2050. Every human activity creates carbon dioxide. We can only hope to minimise this. So, is this a relative measure taking us back in time to a lower level of carbon dioxide generation than we have now, i.e. base lining it to a specific year in the past? 2. With regard to renewable energy generation methods, recent studies have called into question the overall benefits of biomass wood pellets if the total supply chain impact of their production and transportation are taken into account. 3. Indeed, if we're truly concerned about global climate change then the end-to-end, or life cycle, cost needs to be considered, including production costs in terms of energy consumption, carbon footprint, pollution etc. in the country of origin right through to disposal. To a certain extent, this applies to all new technologies such as solar PV panels, wind turbines etc. but some will obviously have a greater net impact on the environment than others. Most solar panels are manufactured in China. Production of solar panels uses electricity. Most electricity in China comes from highly polluting coal-fired power stations, using coal shipped from Australia. We need to consider the overall life cycle impact of solar panels on the global climate, not just the benefit of using the finished article in North Somerset. On that measure, I suspect that ground and air heat pumps or geothermal might be the "greenest" solutions for heating buildings - they are certainly less visually intrusive. 4. On the subject of solar pv, it is mentioned that the energy has to be used as it is generated. I have a solar pv system and that is true but it's not easy so, historically, I've only managed to use just 30% of what my system has generated over the past 8 years. The remainder is exported to the grid. The electricity is also not available when I need it most, i.e. at night or when it's cold and cloudy (or during power cuts). There are	1. The target is for net zero, rather than absolute zero. The UK's net zero commitment is base lined to 1990. 2. Noted 3. Lifecycle and measures of embodied carbon/ energy is referenced in paragraphs 3.10 and 3.18. This can be considered further in the context of the Local Plan 2038. 4. Battery storage can be considered as part of policy for Local Plan 2038. 5. Renewable technologies will not be ranked as part of this document. This guidance supports adopted policy CS2 which states that: 'P*olicy CS2 does not prescribe the type of renewable energy for individual applications but instead advocates that a range of technologies be explored choosing the one that gives the best environmental performance, is cost efficient and has no adverse impacts on the surrounding area. In each instance through the development of the design and feasibility, the available wind, solar and other resource should be considered.'* Paragraphs 3.10 and 3.18 refer to the embodied energy/ carbon of buildings will be considered in the context of the Local Plan 2038. 6. Noted. Also note that the design life of typical buildings has been amended to 100 years for dwellings and 60 years for commercial buildings.	No

	now compact storage batteries available which would enable me to overcome this although it would not be cost-effective for me to install one at this stage, since they cost several thousand pounds. However, if they were installed alongside the solar panels as part of the original construction of the building, especially in large housing developments where economies of scale come into play, then I think that a long term energy cost saving could be demonstrated and buyers might then be tempted to pay a premium on the purchase price to help save the planet (and money in the long term). 5. No preference is expressed in the document for any particular form of renewable energy generation. Clearly, as mentioned above, some are better than others in terms of their life cycle cost to the global climate (rather than the cost of installation or ownership). The various methods of renewable energy generation should be ranked in the document in terms of their overall benefit on restricting climate change. I realise that not all methods are suitable for all situations, but this 2050 target is tough so it's best, surely, to push the ones that will make the biggest impact from the outset in order in order to have the best chance of achieving it. I don't think that you can rely on commercial developers doing "the decent thing"! 6. I agree with the focus in the document on designs that will minimise the amount of energy that will be required for heating and lighting through the lifetime of the building. That has to be the priority. However, the environmental costs of producing the materials to be used, wherever that may be in the world, are fundamental in determining whether the claimed benefits are real. I like the emphasis on use of local materials. Also, houses should be built to last so that the environmental costs of construction are amortised over a very long period. Is 60 years for a house or 30 years for commercial buildings the right answer? I think not. That's maybe part of the reason why we have the ugly sheds on retail and business sites everywhere. Presumably they are cheap to build and thus can be replaced more economically every few years but that's not good for the planet.		
Individual	Putting it simply house building standards in the UK are poor at best. Maybe you should look at Germany for example, houses are built to a	New policy for Local Plan 2038 will consider the potential to set higher standards.	No

	higher standard and to cope with colder and hotter weather than the UK. Walls of houses are thicker and denser and use external insulation, triple glazing is common, and the use of electrical storage heaters and underfloor heating is prevalent. Also, windows are fitted with roller blinds which are good in winter and summer. Ergo modify the building regulations to mandate the following: - Wall construction materials must be higher thermal standard and have higher levels of insulation. - Go all electric. Use storage heaters / underfloor heating use electric water heaters. - Cover total roof area with Solar Panels and use Hot water generation panels to heat water. - Use triple glazing		
Individual	This document is a sensible response to the climate emergency. As a resident of North Somerset, I support it.	Noted.	No
Individual	I think this is a great piece of work within the constraints imposed by central Govt. With regard Viability Assessments, these need to be updated to reflect that whilst the initial cost may be higher, the on-going running costs will be lower. A 5% uplift spread over a 25-year mortgage should be outweighed by the annual energy saving. The Govt. is consulting with mortgage lenders to encourage them to lend higher amounts against buildings with lower operational costs. Enforcement will be key and NSC will need to factor in increased inspection. Otherwise builders' plans will meet the standards, but the construction will not. Research shows that only about 10% of new build properties actually meet their design spec. In particular things like airtightness and thermal bridging are major problems with current building practices.	The last sentence of the first paragraph of the viability section has been amended to: *'Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'* Enhanced monitoring and enforcement procedures are being considered.	Yes
Individual	I'm responding as an invested member of the public rather than a building or planning professional. I found the document quite a difficult read, rather than address specific sections of the document I'd like to make observations in general.	New SPD guidance will be provided to support Local Plan 2038 and the format will be reviewed. Viability - If the requirements impact on viability of any scheme, then this can be taken into consideration when considering the planning application. Section 10 which	Yes

	As someone very interested in the local environment I'm generally in favour of the principles and aims of the proposals, especially those encouraging consideration of the energy impact of new builds, and those encouraging the provision of green open spaces, planting of new woodlands and the connecting of habitats. I'm less convinced by the drive to energy efficiency of buildings or imposition of technologies that might be specific solutions – smart meters for example are not popular and have caused difficulties for people switching suppliers; others are concerned with real-time monitoring and exposure to cyber threats that just don't exist without a smart meter. I have concerns that well intended policy might have unintended consequences, whether this 'one size fits all' approach should be applied to ALL builds; whether single dwellings should be exempt? As a brief illustration of an unintended consequences, I'll use a personal example in relation another recently introduced planning policy which in theory should protect habitat but in my case is likely to jeopardise it - simply because the Council has no means to apply any logical discretion. The policy to which refer is the requirement of an ecology survey to accompany for all new builds. This has affected the plans I had for a new visually pleasing agricultural building which I would have used to store the tools I need to manage a Traditional Cider Orchard which I've been establishing over the past four years. This project would establish valuable habitat characteristic of the area and is entirely self-funded. In my case I'll own up to losing patience with what I saw as a bureaucratic planning process that was ultimately going to introduce additional and unnecessary costs. It's left me questioning the entire project and feeling penalised for taking the initiative; I've been advised to circumvent planning altogether by using unsightly temporary / mobile storage.	sets out the principle to viability states that: *'Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'* The policy is not prescriptive on the measures that can be applied to meet the requirement. New policy Local Plan 2038 will seek to address some of the issues raised.	

	The example I've used, is likely to be fairly unique but is in relation to a relatively uncontroversial policy, and one that in general makes sense, of course it's intended to protect habitat and help mitigate cases where habitat is lost – in my case it's simply adding cost and bureaucracy to a project that's already stretching my pocket. Might the same be true for the new Sustainable homes standards? Should these apply to ALL new builds? The standards are anticipated to significantly increase the costs of a new build; your own calculations suggest this could be up to 11%. This could have several consequences and may make provision of affordable housing less attainable. Encourage developers to cut corners elsewhere, such as aesthetics. Discourage those who want to self-build on a budget – being forced to incorporate features which are NOT strictly required. Considering a few more detailed aspects of the requirements, whist energy efficiency is important it becomes less so if all the energy used is renewable, and the exact energy mix should surely be discretionary to the householder, if they prefer direct sources of heat, or the immediacy of the gas boiler for hot water, should they be denied? In fact, there seems to be a general theme to discourage gas boilers for domestic heating, however, they are efficient, and it's cheap and easy to distribute gas though existing infrastructure. Moreover, the safety case has already been made in other parts of the country for the introduction of 20% Hydrogen to be added to domestic gas supplies, higher mixes of hydrogen are anticipated, and a hydrogen economy has often been muted. Could policies like these in North Somerset discourage investment in this sector? Whist I can see the benefit of energy efficient homes I don't think we should mandate it, let people have the choice. I'd always prefer to cook on gas hob not an electric one; and I prefer the immediacy of a condensing gas boiler. If I were buying a new house, I'd look for character first and foremost, a gas connection would also be high on the list, I'd pay a premium for a home with gas. In fact, I'm not specifically concerned by the energy		

	ratings – I'd dispute if all the features to make a home cheaper to heat actually adds much value, I think that's a high subjective consideration. Of course, I have double glazing in my home, I've also insulated the loft, these are important functional features that don't impact the choice of the way we live and are generally desirable, some of the other aspects of the proposed sustainable policy go well beyond this. My total energy costs for a reasonable size semi-detached house are £1200 / annum, I chose a green electricity tariff and my gas usage is 100% offset. Let's assume I want to move to a new build of the same size, and that this would have cost £200000 today, but will cost £220000 to meet the new proposed standards -i.e. A 10% increase. Even if the new home required zero energy it would be a 16-year payback period when compared to a home without these features. As for carbon emissions, my electricity is already 100% renewable, my boiler does emit C02 but that's 100% offset, and as I've noted, with the introduction of Hydrogen carbon could be reduce anyway. So in summary, I agree with many of the aims and objectives of the proposed update, especially those to protect and enhance the environment, I agree with many of the objectives to improve energy efficiency, but I am opposed to specific features like local generation of energy, imposition of smart metres, or aspects that might discouraging gas as an option, I don't think the costs of these features is always justified or specific technologies should be promoted. I don't think the policies should apply where a small number of dwellings is proposed and believe existing building regulations and planning guidance would be adequate to decide these applications.		
Individual	I think this is excellent (with a concern that nothing has been in place for some time when developments have been taking place!) & very consistent with the declaration of a Climate Emergency. 10 - 15% seems low. It's a pity specific's can probably not be stated e.g. heat pumps but that may come in time & for existing buildings as well (although by then it may all be too late).	The SPD guidance supports current policy and cannot impose new policy standards for renewable energy. New local policy in Local Plan 2038 will consider the potential to set higher standards.	No

Individual	Thank you for the opportunity to comment on the planning document for creating sustainable buildings in North Somerset. As central government have ordered us to build so many houses, which I do question when considering how many empty properties there are in North Somerset, to build them with the environment and sustainability in mind is a great leap forward for all concerned. However bearing in mind that recent house building nationwide has produced such shoddy, poor quality, cost cutting and indeed dangerous housing that is timed to be financially rectified by either the house holder or the taxpayer, hopefully there will be sufficient and frequent unannounced inspections for such buildings to match up to the high quality expectations. These will be houses for a new generation who will expect the green sustainability.	Noted. Enhanced monitoring and enforcement procedures are being considered.	No
Individual	I thoroughly endorse the proposal to upgrade building standards, and support anything that requires new buildings to be as close to carbon neutral as possible.	Noted.	No
Individual	I strongly believe that all new housing estates and new commercial buildings should be constructed with the highest possible level of insulation, fitted with air or ground source heat pumps for heating and solar PV for electricity generation. Take the climate emergency and act beyond the minimalist targets in this document. Why can't plans for current developments be updated at the Reserved Matters stage to reflect this, rather than impose it only after this planning document is approved? WE need to do something drastic NOW!	This guidance provides an interim measure to require energy efficiency improvements on all new residential developments applications ahead of new policy within Local Plan 2038. The SPD must reflect the policy framework set out in the adopted Core Strategy 2017. We are not able to impose new requirements on Reserved Matters applications.	No
Individual	All new buildings and places should be required to be carbon zero / positive (at the cost of the builder). All new developments should be required to be energy efficient (to the highest standard) but also generate energy (through solar panel installation, air source heat pumps or other renewable energy generation). They should also include EV charging points.	New local policy in Local Plan 2038 will consider the potential to set higher standards. This guidance provides an interim measure to require energy efficiency improvements on all new residential development applications ahead of new policy. New policy relating specifically to renewable energy generation will be included in the new Local Plan and	No

	All new developments should also include local community energy generation. All new developments should enable sustainable forms of transport including cycling and walking infrastructure or easy access to public transport. All new developments should include cable connectivity to enable people to work from home. The costs should be picked up by the developer.	we considering the role of community energy within that. Connectivity can be considered within policy for Local Plan 2038.	
Individual	The Council should support, encourage and add "weight" in positively determining planning Applications which provide new or experimental Sustainable Energy Sources. This would stimulate the British Inventiveness to help reverse Climate Change.	This can be considered for policy within Local Plan 2038.	No
Individual	We have had the opportunity to create an Eco house that will ensure that as we are in the eve of our lives, we will be able to remain independent for as long as possible, both financially and physically. The house was constructed 5 years ago with strong emphasis on sustainability. All exterior walls have 270ml of insulation. There are as many solar panels on the roof as possible. We have the smallest gas boiler on the market - this is to heat a four-bedroom house. Recently the mixer valve failed, so no heating (during the coldest snap!) however, we were able to put into action a tiny wood burning stove (installed in case of a power cut) coupled with the Mechanical Ventilation Heat Recovery system kept us extraordinarily warm - a combination of the wood burner, MVHR and the thickest insulation. Energy bills are minuscule as a result. Solar energy: All houses should be built with as many solar panels as possible and far more than the statutory insulation. Instead of paying vast sums to landowners, the money should be invested in far more sustainable properties that will last for centuries. Being formerly in the medical profession, I feel that a lot of issues relate to poor housing. Houses should have sufficient space to encourage	Noted and new policy for Local Plan 2038 will consider the potential to set higher standards.	No

	mobility in later life and for families with children to have adequate space for mental health purposes. I have inspected newly built homes that have not even got a dining area where a family can eat together around a table. The kitchen is too small, and the only option is to sit and eat in the sitting room with plates on knees. How can this be good for family cohesion? Design of new builds needs to be vastly improved to incorporate disability, mental and physical wellbeing. Proportions for rooms are important, yet the tendency by developers is to squeeze everyone into the smallest place possible. This is not good for mental health. Housing estates should have a lower ratio of houses/hectare so that people are not forced to live on top of their neighbours as much as they currently do. More attention should be given to where new houses are built. Not miles away from the main employment centres where the village is not even on a main public transport route. New housing estates should be situated within 10 minutes walking distance from train stations. Developers should not be allowed to rip out hedgerows. Councils already have the power to prevent this, but it is not being used. The natural environment is incredibly important. Green spaces should be a very high priority. It is simply no good to say that the developer will plant a new hedge, many are old and constitute the character of the landscape. I am deeply concerned about the abundance of unguarded attenuation ponds that are sprouting like measles. They are ugly, and in recently instances only bounded by a low post and rail fence and thus dangerous, but they needn't be. They could be made to be attractive areas for wildlife and safe enjoyment for all. Take a look at the one constructed by Belway homes opposite Touts adjacent to the A38 in Churchill.		
Individual	Agree it is essential to refresh and update that document given the climate emergency declaration by HMG May 2019 and NSC.	The requirement of Code Level 4 equivalent is a 19% improvement on Building Regulations Part L1A.	No

	It is important that pushing forward the drive towards carbon zero Planning Policy uses relevant current industry terms and opportunities. Therefore, instead of CSH Level 4 why not use Building Regulations Part L1 A (new build) and Part L1 B (refurbishment). It is necessary to employ a licenced assessor to create a Predicted Energy Assessment (PEA) at design stage and for that to be converted to an Energy Performance Certificate (EPC) on completion. Current new housing achieves at best an EPC grade 'B'. Homes we design and construct achieve Grade 'A' as we ensure we work to higher standards than current regulations for thermal insulation and renewable energy. We recommend use of PEA/EPC Grade 'A' to set standards at planning stage. Renewable energy can include Solar PV, Solar Thermal, Ground or Air Source Heat pumps, etc., but it is also possible to 'sleeve' green energy through the existing electrical grid. That can be a far more efficient way of demonstrating use of green/renewable energy. Token PV on a roof of poor orientation etc., is inefficient. Planning policy should accept evidence of green energy power purchased through a Power Purchase Agreement (PPA).	The requirement for renewable energy generation is a key element of Core Strategy CS2 and cannot be changed.	
Individual	General agreement on all aspects. Concern at the feasibility of improving the existing historic (pre-1919) buildings - said to be 20% of our total stock, especially those in conservation areas. I understand why this document states the constraints, but this needs to be backed elsewhere by resources to encourage and assist owners to make progress.	The retrofitting of the existing housing stock is being considered as part of the Climate Emergency Strategy and Action Plan.	No
Individual	I support the basic concept, but more should be said about preventing condensation, the benefits of solar gain, and the need for homes to be well lit using natural daylighting. Internal wall insulation must have a vapour barrier installed and on the warm side of the insulation. Too many homes have had internal insulation without a vapour barrier and condensation happens where it cannot be seen, at the cold side of the insulation leading to mould growth and unhealthy conditions. This is referred to as interstitial condensation. I have seen serious condensation in power socket	Paragraph 7.4 - removed reference to avoiding small windows and included that shading should be provided on south facing windows. Cladding is not specifically advocated as a sustainable design measure within the document. The development on the front cover is an example of a zero-carbon rated development. Additional guidance relating to overheating will be addressed in more detail in the Local Plan 2038.	Yes

	backboxes installed in the internal insulating construction caused this way, and that is dangerous. South facing glazing has lots to commend it if proper control measures are in place. Winter sun can effectively heat the house. Daylight is good for wellbeing. Small windows cut down daylight and dark houses are not only depressing; they lead to more energy use by the need to turn on electric lighting. External two-layer roller shutter blinds provide control. The first layer is a screen that cuts down gain in summer but allows some daylighting. The second layer is like a security shutter and insulates the glazed areas to a greater U value than triple glazing. It can cut out all solar gain in very hot weather. I note that wood cladding is shown on a home on the cover of this document. While well-known traditionally it is combustible and a lightweight construction with low noise insulating properties. If wood is to be used the thickness must be great enough to allow a charred coating to be formed in a fire that would insulate the core of the member against further charring and burning through. Natural ventilation only works when the outside air is several degrees cooler than the inside air, and it is less than say 25C. If it is 25C outdoors, then indoors it will be 27C or more. What is the target indoor temperature in hot weather that you want to be designed to? We can expect outdoor temperatures of 35C or more, so any home that you build now, if it doesn't have some form of active cooling, will not provide acceptable conditions for very long and will require cooling retrofitting. Air source heat pumps will create heat islands. Ground source heat pumps, if implemented in any great number will create frozen ground in summer and the ground temperature will not recover enough to give the ability to heat in winter! Use of water evaporation will stress our reducing water supplies! Heavyweight buildings are good. Overnight precooling works only when hot days are followed by cold nights. Target indoor/outdoor temperatures need to be set, and some new ideas identified if we are not to make things worse.	The type of renewable energy technology is not mandated, to enable the selection of the most suitable technology for different types and locations of new development.	

Individual	This is very welcome. However, the energy efficiency standards currently permitted by central government are not nearly ambitious enough. It is hoped that NSC will push central government for higher standards. The BREEAM standards aimed for should be higher, as this is permitted by central government. It is also important that NSC includes ambitions for integrating renewable energy generation into its development plans. This includes free standing solar PV or wind turbines in the Green Belt, which is discouraged under current policy.	New policy for Local Plan 2038 will consider the potential to set higher standards.	No
Individual	1. "an overarching goal to become carbon neutral by 2030" - this goal needs to be reassessed (1) because N Somerset is largely agricultural and both tractors and cows are NOT going to be carbon neutral by then and (2) post pandemic, the economy is going to shrink and it's the wrong time/ timescale to be investing in carbon neutrality. 2. "7.4 As a response to the above, a range of building-scale adaptation measures should be incorporated into new or existing buildings. This should include: Flood resilience measures:" The Flood Resilience measures are inadequate. First floors raised to 0.5m above predicted 100 Year flood levels is the only way to prevent residents having to pay stupidly high insurance premiums and/or suffering material loss (carpets and furniture) when floods do happen. The measures outlined protect the new buildings, but not the contents. It would be better to prohibit residential building on known flood meadows and areas exposed to rising sea level. [Except where Netherlands style protection is in place]. 3. The provision for local amenities (walking distance from new builds - say 500m) still seems weak. These new build provisions seem to be a prescription for costly "sink estates", where any shopping leisure trips have to be made by car. And that impacts the much-vaunted carbon neutrality. You need LOCAL shops and cafes.	Paragraph 7.4 – this can be considered within Local Plan 2038. Given the priority accorded to the climate emergency, development on land at risk of flooding will be avoided.	No
Individual	All new buildings should have eco-friendly heating, double glazing and have enough lagging to prevent too much heat escaping. Preferably solar tiles on the roof would help everyone.	Noted.	No

Individual	The planning of housing on flood water plains should be stopped. Up to date environmental homes to be built. More wildlife areas parks, green spaces and trees as a lot of our wildlife depend on it. More trees being cut down is unacceptable unless needed to maintain safety issues such as underground cables, drainage systems.	Noted.	No
Individual	This document seems to promote sustainability in using Green Belt land close to towns and cities. This is not the most sustainable options and creates urban sprawl. Making new houses more sustainable is of course important but where they are built is just as, if not more important in terms of sustainability.	Noted.	No
Individual	When code for sustainable homes was 'introduced' years ago, it cost developers a fortune. About £3000 extra per house just for the report but looking at this document, it will cost even more. It suggests pre-app which takes ages and you only get a half decent response when it is a service level 3 that costs a lot. A new application will need all building regulation details up front as well as energy reports and drainage reports so for the small developer single plots are going to cost a fortune to build and will discourage this - when there is already a shortfall of houses. There will need to be some agent training BEFORE this is introduced to go through what will actually be required but it would also be useful to see if NSC are actually aware of all of the cost implications to developers by introducing this further requirement. So for a new house clients could be looking to pay.....£600 for a tree report, £2000 for an ecology report, £3000 for a breeam report, £2000 for a drainage engineers report, costs for house design to a full building regulation standard, a topographical survey £800, CIL £6400 (based on 80 sqm house) planning fee and building regs fees, sound tests - £300, air pressure tests £300, services in such as gas/elec - £5000, this list is not exhaustive and these fees need to be paid even without knowing if a client is going to get planning! I'm afraid that this looks like another death nail for small developers where NSC do not seem to have any idea of the implications to small developers. It will just leave the big developers to build but there is no	Pre-application discussions are recommended but are not a mandatory requirement. Energy statements are a mandatory requirement of all planning applications. Agent training will be considered. Viability - if the requirements impact on viability of any scheme, then this can be taken into consideration when considering the planning application. Section 10. Viability Assessment. The last sentence of the principle has been amended to: 'Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'	Yes

	land out there. I am all for reducing carbon but not when a front-loaded cost has to be borne by the developer even before they even know whether they will get planning or not? I may have misinterpreted this but by just putting this document out there without first talking to agents or developers will be another cost that will further reduce the building population out there. Happy to have a discussion or even some training before this is implemented/adopted but I doubt that will happen.		
Individual	This is a very important document for planning new buildings and improving the energy efficiency of existing buildings (including retrofitting). The implications of climate change for buildings and of the zero-carbon target (2030) make this work very urgent, particularly the work needed on existing buildings, residential and other. Fuel poverty is a major concern and retrofitting poorly insulated and inefficiently heated homes would go some way to rectifying the situation. In many ways it is easier to set high standards for new buildings which should meet at least the minimum standard of sustainability. I have myself used the Green Homes Grant to install a solar thermal unit having already paid to have solar panels installed. I am concerned at the possible withdrawal of the Green Homes grant scheme when it covers so many of the recommendations made in this document. It is such a shame that this programme was not rolled out locally and has instead been outsourced to an American company. Local authority initiatives are so much more attractive, but I appreciate that the resources have to be devolved to them in order for this to happen. These consultation documents which all reflect the Climate Emergency, are excellent and the work which has gone into them is very impressive. It is good to see the Climate Emergency being the basis of the work of so many of the authority's services, rather than being supplementary to them. These is no other option, but residents of North Somerset may not be aware of the scale of change which is needed.	Noted. The need to address standards in existing/ older properties will be considered as part of the Climate Emergency strategy and action plan.	No
Individual	This is a significant and important amendment to current planning rules. I strongly support the change and would urge North Somerset planners to introduce it immediately even if the policy change has not yet been formally enshrined in the Regulations. It is in everyone's interest to make this change.	Noted.	No

Individual	I would add under section 9 of the summary of changes the Retrofitting energy efficiency, renewable and low carbon technologies, the implementation of the latest wind farm technologies. A recent article in the Guardian highlighted the latest in small wind turbine technology development. The hills surrounding North Somerset are ideal for this technology. Along with ground source heating, I believe these sustainable technologies should be incorporated in the sustainable buildings and places planning document. https://www.theguardian.com/environment/2021/mar/16/good-vibrations-bladeless-turbines-could-bring-wind-power-to-your-home	The Council is not prescriptive about the types of renewable energy to be used to meet the policy requirements.	No
Individual	Housing should be built on Main Roads Access to Motorway should be easy employment should be easy to get to Rural Villages should be increased in size to make them Viable for schools Post offices Pubs. Hewish is a village that is dying through lack of development yet it's on a main Rd near Motorway Been land offer at a large discount by me not development money on the A370 yet it is ignored Why?	Noted.	No
Individual	Whilst I don't expect much of the contents to affect me directly, as we have already completed building works on our property, I support the enforcement of more sustainable practices in the planning and development process both locally and nationally. From the document, I support the amendments and the principle behind them.	Noted.	No
Individual	Climate change is here and it's not going away. All new houses should be carbon neutral in their construction and day to day living usage. They should include solar tiles for power generation and heat pumps to replace gas boilers to heat homes as a minimum when constructed.	New policy for Local Plan 2038 will consider the potential to set higher standards.	No
Individual	North Somerset Council (NS) embracing the urgent need to address the climate emergency is to be applauded. There is however a need to better understand how measures taken by one authority impact on other adjacent authorities, the region as a whole and beyond to the country. This needs to be addressed through working with neighbouring authorities as well as regional groupings such as WECA and regional strategies developed. It is acknowledged that some work has taken place, e.g. the West of England 'cost of carbon reduction in new buildings' study, but this needs to be wider ranging e.g. the Renewable Energy Resource Assessment Study needs to be carried out across the region in order that a regional strategy can	The Council works closely with the other West of England Authorities including WECA. Policy section 2.12 – added reference to the Council's UK:100 pledge. The use of terminology and the Council's definitions relating to net zero and carbon neutrality will be reviewed and clarified in the new Local Plan and Climate Emergency Strategy and Action Plan.	Yes

	be developed though WECA. This potential negative 'regional impact' of measures taken in North Somerset is touched on in Section 6 Sustainable Drainage Systems (downstream management of run-off) but does not appear to have been considered in respect of other sections of the SPD. There is no explanation as to why the 'bar' is being dropped from Net Zero (UK100 pledge) to Carbon Neutrality in respect of the Councils own operations, and now encompasses the whole community (though this is to be supported), a task that North Somerset has pledged to achieve through working with residents and businesses (Uk100 pledge). All new homes to be zero carbon or net carbon plus is to be applauded and many developers are already embracing this but with so few new homes being built this cannot be relied on to deliver the Councils pledges. Whilst Section 9 refers to the need for existing buildings to be brought up to modern standards, arguably at least zero carbon, to achieve the Councils pledges, there is no discussion on how property owners are going to be engaged with (worked with) to achieve this. Unless this is addressed the plan is a plan to fail. Executive Summary - Greenhouse gas emissions are made up of Carbon 75%, methane 16% and other gases 9% (partially explained to the incomplete Glossary to this document). You cannot say "Net Zero Carbon" by 2050 is a more ambitious goal than an 80% reduction in Greenhouse Gas – it is a less ambitious goal (though higher than the Climate Emergency Declaration). My understanding is that the 'worldwide' plan is to concentrate on Carbon reduction whilst ways of dealing with other emissions efficiently are developed, this is however not an excuse to ignore the other emissions and their sources. I believe that the Council has an obligation to educate the community on the meaning of the 'jargon' which is used in a lot of Environmental	Glossary - new SPD guidance will be provided to support Local Plan 2038 and the format will be reviewed. This SPD guidance supports planning policy and relates primarily to new development. However, some guidance is provided on retrofitting in the existing built environment. Actions to improve the efficiency of the existing housing sector will form part of the Climate Emergency Strategy and Action Plan. This strategy and action plan will also set out how the council intends to work with residents and businesses to tackle the climate emergency. This SPD guidance provides an interim measure to require energy efficiency improvements on all residential development applications, ahead of new policy to be set within Local Plan 2038. New SPD guidance will be provided to support Local Plan 2038 and the format will be reviewed.	

	Policy, consultation and discussion papers and documents like this SPD should have a proper Glossary (defining all the environmental terminology used in the document concerned) included. There is also no mention to the UK100 (of which North Somerset Council is a member), within the consultation document, and the Pledge NSC entered as part of the UK100 which included reducing the Councils own (Greenhouse Gas) emissions to Net Zero by 2030 and work with our residents and businesses to bring our wider communities' (Greenhouse Gas) emissions in line with Net Zero as soon as possible (and by 2045* at the latest). The consultation misses a valuable opportunity for the Council to set out its strategy for engaging and working with residents and businesses to achieve its pledge. An explanation should be provided as to why North Somerset is abandoning the UK100 Pledge (based on Greenhouse Gas) and lowering its aspirations to just Carbon Emissions (although a more achievable goal) and as to whether the other West of England Authorities have been consulted on this proposed change in strategy? The North Somerset Councils Climate Emergency Declaration sets an aim to become Carbon Neutral by 2030, this is significantly different from Net Zero Carbon. Carbon neutrality means balancing Carbon gas emissions by 'offsetting' – or removing from the atmosphere – an equivalent amount of carbon for the amount produced, whereas a commitment to Net Zero Carbon means reducing Carbon emissions with the goal of balancing the emissions produced and emissions removed from the earth's atmosphere i.e. without offset.		
Individual	This policy is encouraging and fits in with NSC commitment to the Climate and Nature Emergency building sustainably. In our village many organisations and Backwell Parish Council shows a commitment to with their own policy 'green' agenda. It will be important that NSC holds all developers but particularly large developers and businesses to create energy efficient buildings and developments; which are not dependent on car as a mode of transport. Where and how buildings are produced	Noted.	No

	is important. All developments should provide links to the environmental core strategy with due diligence given to all aspects of the flora and fauna, this must include permitted developments. NSC should more readily challenge and refuse builds which do not comply to at least level 4 sustainable building and places. Also, Highways must also have a sustainable and environmental lead on their decision making, all too often the Highways officers write very bland or non-committal responses which undermine the sustainable aims of the planning dept, there needs to have a more cohesive approach.		
Individual	In principle a good initiative. On briefly scanning this I have two comments: 1. 19% reduction in CO2E is a step in the right direction but not nearly enough. To avoid global temperature rise exceeding 1.5 degrees we globally need to achieve net zero by 2030 not 2050. I realise you are working to central government policy. But you should take account that this policy is far from adequate and will result in a ghastly future for our children and grandchildren. Hence... 2. Your section 10 Viability Assessments is a get-out clause and should be cancelled altogether. No development should proceed that does not meet the criteria. I hope to look at the document in more depth and may have more comments. In particular there may be scope for some offsetting through tree planting.	1. The 19% requirement is Core Strategy policy requirement. The SPD guidance supports current policy and cannot impose new policy standards. 2. Section 10. Viability Assessment. The last sentence of the principle has been amended to: *'Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'*	Yes
Individual	I urge the Council to be as ambitious as possible in its requirements for sustainable buildings. I understand the Government have said that local councils cannot set standards above the Code for Sustainable Homes Level 4, but it seems the Council is able to set much higher standards for non-housing, and I think it should do so. The required level of on-site renewables of 10% or 15% does not seem very ambitious or onerous, especially as the costs of solar panels have reduced substantially in recent years. An increase in the provision would have little impact on the cost of a new development. Under the section on viability considerations, I am concerned by the statement that the Council will seek to ensure that the policy requirements do not act as a barrier to otherwise acceptable development. If we are in a climate emergency, then the target of achieving carbon neutral development must be given the highest priority	The BREEAM requirement of Core Strategy Policy CS2 (clause 3) imposes sustainable building design standards on non-residential/ commercial properties. The renewable energy standard is a Core Strategy policy requirement. The SPD guidance supports current policy and cannot impose new policy standards. New local policy in Local Plan 2038 will consider the potential to set higher standards. Section 10. Viability Assessment. The last sentence of the principle has been amended to: *'Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'*	Yes

	and the costs to achieve this will need to become a normal and accepted part of the development budget. I support the Council goal of becoming carbon neutral by 2030, and the Council should make it clear that any development that does not further that goal will be unacceptable.		
Individual	I think the aims are laudable but probably don't go far enough quickly enough. The climate change we are experiencing is the most important challenge for mankind and the timescale we are looking at currently to make changes is too long. Also, Covid 19 has changed so much of what we do and a lot of that will continue so we cannot press on with ideas that don't recognise that. It is unacceptable to disturb our environment anymore, particularly with the built environment which, when the land is concreted over - there is no route back.	New local policy in Local Plan 2038 will consider the potential to set higher standards.	No
Individual	It is unfortunate that the number of houses allegedly required in North Somerset as dictated by central government almost certainly exceeds the true figure and probably ignores the number of empty houses and those for sale, therefore not needing to be built. It is reassuring to note that where houses are built, they are to be sustainable, particularly since a significant number of newly built properties have proved to be full of defects requiring significant work to rectify problems. It is to be hoped that future development will be of a size and price within the reach of first-time buyers and will only be permitted on land that cannot be used for agriculture and is not on flood plain. Furthermore, does not destroy a beautiful landscape of which we are truly only temporary users and should be left for those who come after us.	Noted.	No
Individual	This document is a step in the right direction but falls short of what is required. The principles are set out clearly and it is acknowledged that current government guidance in the NPPF 2019 limits what the local planning authority can require from developers. It is nevertheless disappointing that we are only now moving towards BREEAM 4 standards when it is well established that new development should be zero carbon standard if we are to achieve anywhere near the carbon reduction targets of 2050 let alone 2030. The government is moving towards this in the 'Future Homes' agenda, but it seems that we are destined to build many more homes which are far from consistent with	This SPD guidance supports the Core Strategy policy requirements of CS1 and CS2. This updated guidance provides an interim measure to require energy efficiency improvements on all new residential development applications ahead of new policy in Local Plan 2038, which will consider the potential to set higher standards.	Yes

	the Climate Emergency agenda with only 19% improvement on current standards. The 10-15% on site renewable energy requirement is also out of date. There is now a range of efficient systems which are not prohibitively expensive and represent an investment for the householder/tenant as well as contributing to carbon reduction. I welcome the guidance on siting & orientation, which should make it even easier to achieve a higher level of solar energy generation. There are a large number of new dwellings where there is space for several more solar panels. The Viability Assessments must be considerably tightened up in practice. North Somerset has been a 'soft touch' in the past and far too timid in standing up to developers with deep pockets. The construction industry has assumed that it can specify its profit level and effectively set its own 'viability standards'. This must not be allowed to continue and local authorities (through the LGA) should lobby government to ensure that they have the power to keep to their sustainability standards. The Wind Turbine SPD (2014) is out of date and not fit for purpose. It was drawn up to prevent rather than facilitate the siting of wind turbines in suitable locations. The climate emergency requires a shift in the balance of what is regarded as a suitable location. There is much that is commendable in the preamble and the description of sustainability and carbon reduction aims, but this update is only a short-term interim document in substance.	Paragraph 4.1 - highlighted that the renewable energy requirement is a minimum and have added the following bullet: • *The policy requirement of 10% and 15% of predicted energy to be met through renewable energy sources is **a minimum** policy requirement. Developers are encouraged to maximise renewable energy and low carbon energy use as part of the design of all developments.* Section 10. Viability Assessment. The last sentence of the principle has been amended to: '*Where a lack of viability is demonstrated, the Council will take this into account in its decision making.'* Paragraph 4.9 - The Council's approach to wind turbine development is under review and added the sentence: *'This guidance will be reviewed in light of the Council's climate emergency declaration.'* It is acknowledged that this SPD update is an interim measure, ahead of new policy to be set within Local Plan 2038, programmed for adoption in 2023.	
Individual	I agree with the updates set out in the SPD.	Noted.	No