

Table of Comments received and Council Responses

Draft Sustainable Design and Construction Supplementary Planning Document (Feb/March 2008)

Consultee	Ref.	Comments/objections	Page / Para no. in Draft SPD	Council response	Proposed change to SPD
The Clapham Society	1	There is a need to take into account 'architectural character / context of place' when the site is not a conservation area, but that it does conform to an established urban character that makes up most 19 th and 20 th century London.	Section 3	Where relevant these matters should be addressed in design and access statements which are required to accompany planning applications.	No change.
	2	Add to last sentence: '...provided that this can be done without detriment to architectural character'.	Paragraph 3.10	Accept in part. Recognising that there may be circumstances in which passive solar design measures may not be appropriate to existing buildings (including where it would be detrimental to the architectural character), "where appropriate" is proposed to be added.	Para. 4.11, amend last sentence as follows: <i>"If the development is a refurbishment of an existing building or an extension, elements of passive solar design should be incorporated where possible and appropriate."</i>
	3	Say 'this generally applies to New Build'.	Paragraphs 3.32-3.37	The guidance relating to living roofs and walls applies to both new build and existing buildings.	No change.
	4	Guidance on the cost, viability and pay-back (or guidance as to where to get such information) of energy efficiency measures would be helpful. The measures offered are not necessarily sustainable [sic] to typical domestic situations.	Paragraphs 3.12-3.15	Accept in part. Many of the energy efficiency measures listed in paragraph 4.19 are equally applicable to homes as they are to larger developments (for example energy efficient appliances, insulation, and ventilation). The SPD also cross-refers to the Lambeth Residential Alterations and Extensions SPD, which provides further guidance on energy saving home improvements. A	Para. 4.20, add link to the Energy Saving Trust website: http://www.energysavingtrust.org.uk/home_improvements Para. 4.2, add:

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				link to the Energy Saving Trust website is already provided, but an additional reference is proposed which deals specifically with home improvements. Also a new introductory section has been added (ref. paragraph 4.2) indicating the Council's support and commitment in promoting sustainable design to existing buildings as well as proposals requiring planning permission.	<i>"The Council strongly encourages and promotes the inclusion of sustainable design not only in new build but also to existing buildings. Existing buildings make up the bulk of the building stock of the Borough. The incorporation of sustainable design features into existing buildings can make a substantial contribution to the reduction of energy use and use of other resources. Many of the principles in this section also apply to home improvements or other building works which do not require planning permission."</i>
	4	The draft takes little or no account of the need to protect the character of the streets, terraces and houses which add up to London's character and its parts where they do not have statutory protection. Most Victorian terraced housing is not in a conservation area. The character of these buildings is significant and will be threatened by several 'improvements' such as the UPVC replacement glazing unless there is guidance to guard against it."	General	This SPD provides guidance principally in relation to sustainable design and construction principles. There will always be a need to balance sustainability objectives with heritage conservation and other factors and this is alluded to throughout the document. The SPD cross-refers to other UDP policies, which will also need to be taken into account, and the Residential Alterations and Extensions SPD (which provides guidance on replacement windows). Also, generally this is not subject to planning control in the case of single family dwellings.	No change.
Bellway Homes	5	The guidance relating to Site Appraisals and Site Layout and Orientation will result in the duplication	Section 2	The SPD sets out the matters that should be addressed by the site appraisal and description of the site layout and orientation specifically in relation to	No change.

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		of information that will have to be provided in Design and Access statements.		sustainability. If the information is provided in the Design and Access statement the process of including this in the Sustainability Assessment will not be onerous.	
	6	Air source heat pumps are not considered and should be if ground source heat pumps are.	Paragraph 4.23	It is proposed to include air source heat pumps as another form of renewable energy.	Para. 5.37 add: <i>"In addition to ground source heat pumps, air source and water source heat pumps are also available. Air source heat pumps can be fitted outside a property or on the roof."</i>
English Heritage	7	The links to other plans and programmes should acknowledge PPS15 and PPS16.	Sustainability Appraisal	Accept change.	SA Table 4.1.1, include reference to PPS15 and PPS16.
	8	The European Landscape Convention should be included in the International Plans and Programmes section of all sustainability appraisals.	Sustainability Appraisal	Accept change.	SA Table 4.1.1, include reference to the European Landscape Convention.
	9	A sustainability appraisal objective on protecting and enhancing the historical environment should be included to ensure it is treated in a sustainable way. The historic environment is much broader than the 'built environment' as paragraph 4.4 implies.	Sustainability Appraisal	Accept change.	Add sustainability appraisal objective as follows: <ul style="list-style-type: none"> Protecting and enhancing the Borough's historic environment.
	10	The SA would benefit from further historic baseline data than currently listed in section 4.2. The historic environment baseline data should be set out in its own section (as opposed to being included under 'environment'). Various information sources are	Sustainability Appraisal	Accept in part. The baseline data set out in the SA report was informed by the schedule of listed buildings, the register of historic parks and gardens, and information relating to the Borough's conservation areas. Currently, Lambeth does not have a local list. Further, there are no scheduled monuments in Lambeth.	Add to list of baseline data: <ul style="list-style-type: none"> The number of buildings on the Buildings at Risk Register (19).

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		recommended.		It is not considered necessary to set out the baseline data relating to the historic environment in a separate section.	
	11	In section 5, effects on the historic environment and the degree to which the SPD positively contributes to sustainability objectives should be considered. This should include identifying issues and opportunities for the historic environment. The SA in Appendix 1 and 2 should consider the effects on the historic environment separately from the built environment as the resource and potential impacts are sufficiently different.	Sustainability Appraisal	Accept change. An additional sustainability appraisal objective to protect and enhance the Borough's historic environment has been added and the SPD has been appraised against this.	Appendices 1 and 2, appraise UDP policies and SPD guidance against sustainability objective to protect and enhance the Borough's historic environment.
	12	Supports the SPD, but encourages the Council to ensure the implication [implementation?] of the SPD does not adversely affect or undermine the historic, physical and social value of the historic environment.	General	Noted.	No change.
	13	Include a principle that avoids negative effects on the historic environment in the Sustainability Assessment for development proposals to ensure appropriate reuse.	Paragraph 1.5	Noted, however paragraph 2.5 sets out the sustainable design and construction principles listed in UDP Policy 35. Paragraph 2.6 refers to maximising the reuse of existing buildings.	No change.
	14	Table 1 should also refer to PPG15 and PPG16.	Table 1	Table 1 lists national and regional guidance relating specifically to sustainable design and construction. While the policy guidance set out in PPG15 and PPG16 will be a material consideration in assessing relevant development proposals, these PPGs do not specifically relate to sustainable design and	No change.

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				construction.	
		In addition to the BREEAM methodology, evidence and assessment of the historic environment should be required for development proposals. This could include an archaeological assessment, a conservation design statement or other such measures appropriate for a site of historic significance.	Section 2	<p>These considerations are already referred to in paragraphs 4.7, 5.9 and 6.7-6.9. It is not within the scope of this SPD to require an archaeological assessment or other such measures – these issues should be addressed within the Design and Access Statement or in some cases may be required by condition.</p> <p>However, a reference to the English Heritage website and the 2008 guide: Climate Change and the Historic Environment have been added.</p>	<p>Para. 4.3, add:</p> <p><i>“English Heritage has produced a number of guidance documents relating to climate change and its implications for the historic environment, including guidance on improving energy efficiency in historic buildings. These documents are available on their website: www.english-heritage.org.uk.”</i></p>
	15	The Council should make use of Section 106 agreements to improve the energy efficiency of historic buildings in ways sympathetic to their historic character, such as through draught-proofing, improved insulation, internal shutters.	Section 2	Noted. Paragraph 3.6 refers to the use of S106 agreements and planning conditions to secure measures to improve the sustainability of a development. The Council uses planning conditions and S106 planning obligations as appropriate depending on the nature of the proposals and the circumstances.	No change.
	16	Site appraisal should include more than Listed Buildings and Conservation Areas (e.g. archaeology; historic parks and gardens, heritage landscapes and the wider historic environment).	Paragraphs 3.4-3.6	Accept change.	<p>Para. 4.7, amend fourth bullet point as follows:</p> <ul style="list-style-type: none"> <i>Listed buildings, conservation areas and the historic environment – the appraisal should demonstrate the impact of the development on the historic environment (which includes listed buildings, conservation areas, archaeology, historic parks</i>

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	17	Consideration of the historic environment should be included in guidance on site layout and orientation; energy efficiency; materials; living roofs; water resources and demolition, waste and recycling.	Section 3	Accept change. References to the English Heritage website and the 2008 guide: Climate Change and the Historic Environment have also been added.	<p><i>and gardens, and heritage landscapes).</i></p> <p>Para. 4.3, add:</p> <p><i>“Certain design measures may be unachievable in listed buildings or may in some way compromise the historic environment in certain parts of the borough. Applicants will therefore need to carefully consider how to optimise proposals in sensitive locations, particularly in conservation areas, seeking to meet as far as possible the requirements in this SPD while at the same time preserving the character of areas. In many cases, alternative design options will be available which still achieve the requirements set out in the SPD and do not compromise the historic environment. The Council’s Conservation and Urban Design team can provide design advice and guidance regarding works to heritage buildings and development within conservation areas. English Heritage has also produced a number of guidance documents relating to climate</i></p>

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					<i>change and its implications for the historic environment, including guidance on improving energy efficiency in historic buildings. These documents are available on their website: www.english-heritage.org.uk".</i>
	18	The SPD should encourage improvements to the energy efficiency of historic buildings, in ways sympathetic to their historic character. Alterations to historic buildings should always be considered carefully to ensure that they do not cause buildings that were previously functioning well to fail and that they do not compromise the integrity of historic buildings.	Section 4	Energy efficiency is addressed in Section 3 of the SPD. The guidance set out at paragraphs 4.17-4.20 similarly applies to historic buildings. The additional text regarding historic buildings set out at paragraph 4.3 will improve clarity.	No change.
	19	The SPD should make specific reference to the concern that renewable energy installations in modern developments can impact on the historic environment. This should be included as part of the Sustainability Assessment, to ensure the appropriate technology is adopted.	Section 4	The Site Appraisal will ensure development proposals – including renewable energy installations – take into account impacts on the historic environment (paragraphs 4.4-4.7). Paragraph 5.9 states that the Energy Statement should identify whether the site is in a conservation area or is a listed building and paragraphs 6.7-6.9 set out additional considerations when proposals involve listed buildings and conservations areas.	No change.
	20	In addition to Conservation Areas and Listed Buildings, there is other guidance relating to the historic environment, such as archaeology (PPS16) which should be a material consideration in planning applications.	Section 5	The primary purpose of the SPD is to provide guidance on the interpretation and application of Policies 34 and 35 of the UDP. What is being suggested is far wider and not directly related to these policies.	No change.

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Cllr. Diana Morris, Labour Councillor for Thornton Ward	21	'Use Class' should be capitalised throughout the document.		Accept change.	'Use Class' capitalised throughout the SPD.
	22	Suggested that the SPD should be clearer in regards to which applications trigger the UDP requirement that 10% of the energy demand of a development be met through renewable energy technology and which will trigger the 20% requirement set out in the London Plan.		Accept change. Now that the altered London Plan has been published (February 2008), this has been clarified. Paragraph 5.4 has been amended.	Para. 5.4, add: <i>"It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan requires schemes to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications."</i>
CABE	23	No specific comments on the SPD. General comments made in relation to design considerations in the preparation of LDF documents.	General	Noted	No change.
The Westminster Society	24	No comments.			No change.
Thames Water Property Services	25	Considers a key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it	General	Noted. This is not directly relevant to this SPD however this issue is being addressed as part of the work on the preparation of the Lambeth LDF.	No change.

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		demands and to take into account the capacity of existing infrastructure. Supported by paragraph 4.9 of PPS12.			
	26	Support the paragraph on water efficiency.	Paragraph 3.25	Support noted.	No change.
	27	Support reference to 'water and sewerage utilities infrastructure' to service development (para. 3.26).	Paragraph 3.26	Support noted	No change.
	28	A letter of confirmation from the utility company stating that capacity exists within its network, <u>or</u> confirmation that agreements have been signed for the provision of the necessary infrastructure, should form part of any statement. It would be the responsibility of the applicant to obtain these letters from the utility companies.	Paragraph 3.26	Paragraph 4.34 of the SPD states that the Sustainability Assessment should include confirmation of the availability of the drainage and water supply capacity for the development's needs. In addition, a Utilities Statement (letter of confirmation) is listed in the Lambeth Local Planning Application Requirements as being required for major developments.	No change.
	29	Flooding from sewers should be recognised in the SPD (ref. PPS25 Annex C).	Paragraph 3.27	Accept. A reference to PPS25 Development and Flood Risk has been added to Table 1 listing relevant national and regional guidance. The SPD also now refers to the need to assess the risks of all forms of flooding to and from the development (para. 4.7). This is considered to be a sufficient level to address the points raised and as the detail is contained within Government guidance and addressed through Building Regulations.	Table 1, add: PPS25 – Development and Flood Risk Para. 4.7, add bullet point as follows: <ul style="list-style-type: none"> <i>Flood risk – the appraisal should identify whether the development is located within an area at risk of flooding (flood zones), with reference to the Council's Strategic Flood Risk</i>

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					<i>Assessment. A separate Flood Risk Assessment may be required. The risks of all forms of flooding to and from the development should be assessed and applicants should demonstrate how those risks will be managed.</i>
	30	Sewers should be assumed to surcharge to just below cover level and as such basement areas without pumped drainage systems will be at a greater risk of internal flooding. Suggests this should be incorporated as part of the SPD (ref. Part H of Building Regulations).	Paragraphs 3.24-3.31	This is adequately addressed by Building Regulations. The SPD states that applicants should discuss potential flood risk with the Council and the Environment Agency, at which time this, as well as other site specific issues, would be discussed.	No change.
	31	The installation of a properly maintained fat trap on all catering establishments and collection of waste oil by a contractor particularly to recycle for the production of bio diesel is recommended. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses due to blocked sewers.	Paragraphs 3.24-3.31	Accept change.	Para. 4.43, add: <i>“Properly maintained fat traps should be installed on all catering establishments and waste oil should be collected by a contractor particularly to recycle for the production of bio diesel. This is to prevent blocked drains, sewage flooding and pollution to local watercourses due to blocked sewers.”</i>
	32	The SPD should recognise that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not	Paragraph 3.30	Accept change.	Para. 4.46, amend as follows: <i>“Applicants are expected to demonstrate how sustainable</i>

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		allow free drainage.			<i>urban drainage systems will be incorporated into development proposals to reduce the risk of flooding, unless there are practical reasons for not doing so. SUDS are not suitable for use in all areas, for example high ground water levels or clay soils which do not allow free drainage. In such cases, the developer should seek to manage as much run-off as possible on site and explore sustainable methods of managing the remainder as close as possible to the site."</i>
	33	With regards to surface water drainage, Thames Water recommends the following paragraph be included in the SPD: <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as that is the major contributor to sewer flooding."</i>	Paragraphs 3.24-3.31	Accept change.	Para. 4.45, add: <i>"It is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as that is the major contributor to sewer flooding."</i>
Environment Agency	34	The SPD should make reference to PPS25: Development and Flood Risk, regarding sustainability concerns associated with flood risk, including locating development, building in resilience and 'future proofing'	Table 1	Accept change.	Table 1, add PPS25 to list of national and regional guidance. Para. 4.44, add: <i>"The Council's Strategic Flood</i>

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		developments with regard to the predicted increases in flood risk due to climate change.			<p><i>Risk Assessment (SFRA) for the borough and the information from this document will be used in determining whether a site specific Flood Risk Assessment will be required to be carried out in line with PPS25 and its practice guide.</i></p> <p>Para. 4.13, add: <i>“Design should also seek to minimise future vulnerability in a changing climate.”</i></p> <p>Para. 4.14, add bullet point as follows:</p> <ul style="list-style-type: none"> <i>Flood risk – development proposals within flood zones should take into account the flood risk vulnerability of land uses and follow the sequential approach as outlined in PPS25 and its practice guidance. Site layout is also an important consideration when designing sustainable drainage systems.</i>
	35	New policies set out in the London Plan, consolidated with alterations, February 2008 contains policies that may be relevant and / or useful to the	Table 1	Accept change. References to the London Plan throughout the document have been amended to relate to the latest iteration “consolidated with Alterations since 2004”, published in February 2008.	Table 1, update reference to the London Plan updated to refer to the Consolidated with Alterations since 2004 version

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		SPD.		References to relevant London Plan policies have been added to Table 1.	<p>(February 2008) and add reference to relevant London Plan Policies:</p> <p>2A.1 Sustainability Criteria 4A.1 Tackling Climate Change 4A.2 Mitigating Climate Change 4A.3 Sustainable Design and Construction 4A.4 Energy Assessment 4A.5 Provision of Heating and Cooling Networks 4A.6 Decentralised Energy: Heating, Cooling and Power 4A.7 Renewable Energy 4A.8 Hydrogen Economy 4A.9 Adaptation to Climate Change 4A.10 Overheating 4A.11 Living Roofs and Walls 4A.12 Flooding 4A.13 Flood Risk Management 4A.14 Sustainable Urban Drainage</p>
	36	Pleased to note that the SPD will apply to planning applications for new builds, extensions and conversions/change of use.	Table 1	Noted.	No change.
	37	Concern that aspects to be taken into account do not include flood risk, sustainable drainage (SUDS) and biodiversity.	Table 3	Accept change.	<p>Table 3, add:</p> <ul style="list-style-type: none"> • <i>Flood risk</i> • <i>Sustainable urban drainage</i> • <i>Biodiversity</i>

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	38	Prior to the design stage of proposed developments, consideration should be given to the flood risk and biodiversity attributes of the site as these are likely to have a significant bearing on the sustainability of the proposed development. Measures to address flood risk from fluvial/tidal sources and surface water run-off should be incorporated into the design process at the earliest stage possible in order to achieve the maximum sustainability outcomes. Appraisal of the biodiversity values of the site and its surrounds will allow increased benefits for biodiversity by building it into development proposals during the design process e.g. consideration of biodiversity roofs.	Paragraphs 3.3-3.6	Accept change.	<p>Para. 4.5, add to list of policies:</p> <ul style="list-style-type: none"> • <i>Biodiversity (Policy 52)</i> <p>Para. 4.7, add:</p> <ul style="list-style-type: none"> • <i>Flood risk – the appraisal should identify whether the development is located within an area at risk of flooding (flood zones), with reference to the Council’s Strategic Flood Risk Assessment. The risks of all forms of flooding to and from the development should be assessed and applicants should demonstrate how those risks will be managed.</i> • <i>Biodiversity – an appraisal of the biodiversity value of the site and how this can contribute to the objectives of sustainable development (e.g. reducing water run-off).</i>
	39	The layout of proposed developments should not be limited to the objectives related to solar gain and heat losses. Layout and orientation is an important consideration when designing other parts of the development, such as SUDS techniques. Also, development proposals in Flood zones should follow a sequential approach to development	Paragraph 3.7	Accept change.	<p>Para. 4.14, add:</p> <ul style="list-style-type: none"> • <i>Flood risk – development proposals within flood zones should take into account the flood risk vulnerability of land uses and follow the sequential approach as outlined in PPS25 and its</i>

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		layout as outlined in PPS25 and its practice guide.			<i>practice guidance. Site layout is also an important consideration when designing sustainable drainage systems.</i>
	40	The requirements for the preparation of flood risk assessments (FRAs) in PPS25 should be noted in the SPD. Reference to London Plan Policy 4A.14 Sustainable Drainage.	Paragraph 3.27	Accept in part. It is not considered necessary or appropriate to set out all relevant policies contained within the London Plan in the SPD.	Add reference to PPS25 at paras. 4.14 and 4.44, as above.
	41	The promotion of living roofs, particularly with regard to potential surface water run-off and biodiversity benefits is supported. Attention is drawn to Policy 4A.11 Living Roofs and the Walls of the London Plan and Living Roofs, Living roofs and walls - Technical Report: supporting London Plan, PPS9 and London Plan Policy 3D.14.	Paragraphs 3.32-3.37	Support noted. The contribution of living roofs and walls in reducing water run-off and supporting biodiversity is already adequately addressed in paragraphs 4.41-4.46 in the section headed Living Roofs and Walls. It is not considered necessary or appropriate to set out all relevant policies contained within the London Plan in the SPD.	No change.
	42	The Sustainability Appraisal of the SPD identifies flood risk and acknowledges the preparation of a strategic flood risk assessment by the LPA however no flood risk objective has been identified as part of the SA Framework. A large proportion of the borough lies within Flood Zone 3a as defined in table D.1 of PPS25. Due to changes in national planning policy, regional planning policy, guidance and available information, an	Sustainability Appraisal Section 4.4	Accept change. A Sustainability Appraisal objective relating to flood risk has been included.	Add Sustainability Appraisal objective: <ul style="list-style-type: none"> To reduce the risk and minimise the impact of flooding.

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		SA Framework based on the Council's 2002 SEA Scoping Report should not be seen as appropriate for the preparation of the document. The SA framework and its objectives should reflect and incorporate current planning policy and up to date information such as PPS25 which requires flood risk to be addressed at all stages of the planning process and Catchment Flood Management Plans produced as part of the Thames Estuary 2100 initiative. In view of this the SA objectives should include reducing flood risk, particularly with regard to the potential effects of climate change, which may impact upon flood levels from river / tidal sources as well as predicted increased rainfall intensity.			
Drivers Jonas on behalf of the British Film Institute	43	The importance of energy efficient measures in development proposals should be discussed in Section 1 in further detail as it can provide considerable saving over other energy measures.	Section 1	Accept in part.	Para. 4.17, add reference to Energy Hierarchy. Paras. 4.15, 4.17 and 4.18, additional text to reiterate the importance of the energy savings that can be achieved through the inclusion of energy efficiency measures.
	44	Encourages the Council to seek sustainable design and construction within the Borough whilst retaining flexibility for schemes to come forward	Section 1	Noted. This is the aim of the SPD.	No change.

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		with the most suitable energy saving systems in place.			
	45	It is especially important when applying the 'bespoke' BREEAM methodology, the building is assessed correctly and resources are available within the Council to support the approach taken by the BREEAM assessors.	Section 2	The intention of the SPD in relying on an established certification scheme such as BREEAM is to ensure consistency in approach and established technical expertise provided by the BREEAM process which will not require additional Council resources. The BREEAM bespoke methodology is intended to provide the necessary flexibility to address the circumstances of different types of development proposals.	No change.
	46	Para. 3.10 provides a welcome degree of flexibility. Any flexibility added to the draft SPD is imperative to allow development proposals to come forward which provide, on balance, the most suitable solution to a site when taking into consideration all other policy and community aspects.	Paragraph 3.10	It will be for the Sustainability Assessment to demonstrate that best practice has been incorporated into the design of the scheme as stated in the SPD, for example in paragraph 4.18. This is considered to provide the appropriate level of flexibility if any issues do arise.	No change.
	47	When incorporating green/brown roofs, it is important that applicants work closely with the Environment Agency and the Council to ensure the correct solution to a green/brown roof is found, considering the wider contribution of any development proposals to sustainability and the ability to successfully deliver an appropriate development.	Paragraphs 3.32-3.37	Living roofs are not a requirement within the SPD but are promoted and encouraged. It will be for developers to ensure that what they propose is technically appropriate for their development. There are now a number of successful examples of living roofs in the Borough.	No change.
	48	No specific comments on this section. The Council should apply a degree of flexibility to major development proposals that demonstrate	Section 4	Noted.	No change.

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		commitment to the reduction in energy consumption, whilst offering excellent public benefit in other areas. Justification for any flexibility would be demonstrated within a submitted Energy Statement.			
	49	The merits of a scheme in terms of its sustainable credentials needs to be assessed on a site-by-site basis and development proposals should take into consideration the merits of sustainable design and construction on balance with other planning need.	Section 5	Government guidance and planning case law make clear how policy and other considerations should be weighted in making decisions on planning applications. However, climate change and sustainable development is at the heart of Government, regional and the Council's priorities and should also be central to the design of developments.	No change.
	50	Where proposals are not able to provide as comprehensive an offer to sustainable design and construction but can ensure other conflicting requirements are met should not be discounted purely on the site specific merits. Instead, the Council will need to take a pragmatic and considered approach to ensure the development schemes ensure the most appropriate solution is proposed on site.	Section 5	Noted. As above.	No change.
	51	It is important to consider applications as they come forward on balance, to ensure that whilst the needs of sustainable design and construction are met, other important issues are not overlooked.	General	Noted. As above.	No change.
South Bank Employers' Group	52	Each section restates the need to comply with relevant UDP policies. It would be useful if the SPD drew out	General	Noted. Policies 34 and 35 relate specifically to sustainability, and these policies are set out in full in paragraph 2.5. References to other policies are	No change.

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		and highlighted the particular aspects of the various UDP policies referenced which have a particular bearing on sustainability.		included throughout the document as appropriate. This is to ensure relevant policies are taken into account when applying the guidance set out in the SPD.	
	53	Many sections of the policy are very specific and prescriptive. Technologies and opportunities are evolving fast and it may be that more generalised requirements should be part of the policy, with specific current guidance provided in an appendix. Danger that an over-prescriptive adopted SPD will inhibit innovative or experimental solutions which would lead to better outcomes.	General	<p>The SPD sets out guidance to support the implementation of Policies 34 and 35. Sustainability Assessments are required to be submitted with applications for development. These, as the SPD states, should demonstrate that best practice has been incorporated in the design of a scheme. Where better outcomes can be achieved through alternative approaches these will be accepted.</p> <p>In accordance with government guidance, all local development documents produced by the Council including SPDs will be regularly reviewed and revised to ensure they are relevant and up-to-date. This will enable changes to be made to the guidance set out in the SPD as necessary.</p>	No change.
	54	Suggests some elements of the draft Policy could have done with better technical input.	General	Noted. The SPD has been prepared with the advice and guidance of officers who have considerable expertise based on the implementation of many different forms of sustainable design.	No change.
	55	There may be occasions where it is not necessary / appropriate to secure measures by way of s106 obligations, and for example planning conditions could be used. This needs clarification.	Paragraph 2.5	Accept change. In experience to date the use of S106 Agreements has been the most appropriate way to ensure securing sustainability / renewables measures as these can involve a degree of complexity and interdependence which cannot be readily expressed or achieved through conditions. However, the Council accepts that in some cases it may be more appropriate for planning conditions to be used.	<p>Para. 3.14, amend as follows:</p> <p><i>“The Council will use Section 106 agreements and planning conditions, as appropriate, to ensure that developments comply with BREEAM or Code for Sustainable Homes standards, and to secure other aspects of sustainable</i></p>

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		The Council should be careful to ensure complete alignment with this SPD and the draft S106 SPD.		There is alignment between this SPD and the S106 Planning Obligations SPD.	<i>development specified as part of a planning permission such as the provision and achievement of on-site energy generation."</i>
South Bank University (on behalf of South Bank Employers' Group	56	Following Further Alterations to the London Mayor's energy policy the target for renewables is now 20% and is based on CO2 emissions not energy consumption. The whole SPD needs to reflect this.	Paragraph 1.5	Accept in part. A reference to London Plan policy 4A.7 (which was published in February 2008, after the approval of the draft SPD), will be added to the policy context of the SPD.	<p>Para. 2.5, add:</p> <p><i>"The 10% predicted energy requirement will be assessed in terms of CO₂ emissions as this is now the standard approach taken to this issue in national policy and by the Mayor of London."</i></p> <p>Para 5.2, add:</p> <p><i>"This should be assessed in terms of CO₂ emissions."</i></p> <p>Add to para. 5.5:</p> <p><i>"It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan aims to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The</i></p>

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					<i>Council encourages and supports this aim for all applications."</i>
	57	This paragraph should reflect (and maybe re-state) the London Mayor's energy hierarchy (Be lean, be clean be green) more than it does. The whole SPD should be based around energy efficiency first, then CHP, then renewables.	Paragraphs 3.10 and 3.15	Accept change. Reference has been made in the SPD to the Mayor's Energy Hierarchy as set out in London Plan Policy 4A.1.	Paras. 4.17 and 5.6, add: <i>"The Council supports the hierarchy, as set out in the London Plan (Policy 4A.1):</i> <i>1. Using less energy, in particular by adopting sustainable design and construction measures;</i> <i>2. Supplying energy efficiently, in particular by prioritising decentralised energy generation and;</i> <i>3. Using renewable energy."</i>
	58	There are many more simple energy efficiency savings that should be included here to encourage energy efficiency first before CHP and renewables. See checklist in CIBSE Guide F Section 18. e.g. heating and lighting controls are a major omission. SPD needs to make the point that Building Regulations are the baseline and energy efficiency, CHP and renewables are required beyond current Building Regulations.	Paragraph 3.15	Accept.	Para. 4.19, add: <ul style="list-style-type: none"> • <i>Lighting controls (which include dimmers, motion sensors and timers) can be used to automatically turn lights on and off as needed, reducing unnecessary energy use.</i> • <i>Heating controls (for example timer programmers and room thermostats) can control heat levels in different rooms, the temperature of hot water, and on-off times for appliances. They will also make sure the boiler is</i>

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					<p><i>only turned on when it needs to be.</i></p> <p>Para. 4.18, add:</p> <p><i>“Part L of the current Building Regulations should be used as the minimum benchmark and the starting point for the design process.”</i></p>
	59	No mention of mandatory water meters to encourage good use of water.	Paragraph 3.24	Accept in part. A reference has been added to water meters.	<p>Para. 4.41, amend third sentence as follows:</p> <p><i>“Measures can include the installation of water meters, and the specification of water efficient appliances and fixed fittings which reduce water use in WC’s, taps and showers.”</i></p>
	60	Re-stress Mayor’s energy hierarchy as renewables should always come last. Also, make the point that introducing energy efficiency can reduce the 20% renewables required and hence reduce the cost.	Section 4	Accept change.	<p>Para. 4.17, add reference to Energy Hierarchy.</p> <p>Para. 4.15, add:</p> <p><i>“It is important for energy efficiency to be maximised in development proposals. This means that the buildings will use less energy and therefore need to generate a smaller amount of renewable energy to supply the same proportion of the site’s needs. This can in turn reduce</i></p>

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					<p>costs.”</p> <p>Para. 5.7, add:</p> <p><i>“Energy efficiency measures (see Section 4), including CHP, should be taken into account before calculating the carbon emissions baseline and considering the application of renewables to meet any applicable targets for emissions reduction (i.e. 10% or 20%). Improvements to energy efficiency means that buildings will use less energy and therefore need to generate a smaller amount of renewable energy to supply the same proportion of the site’s needs. This can in turn reduce costs.”</i></p>
	61	Following Further Alterations to the London Mayor’s energy policy the target for renewables is now 20% and is based on CO ₂ emissions not energy consumption. The whole SPD needs to reflect this.	Paragraph 4.3	Accept change.	<p>Add to para. 2.5:</p> <p><i>“The 10% predicted energy requirement will be assessed in terms of CO₂ emissions as this is now the standard approach taken to this issue in national policy and by the Mayor of London.”</i></p> <p>Add to para. 5.2:</p>

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					<p><i>"This should be assessed in terms of CO₂ emissions."</i></p> <p>Add to para. 5.5:</p> <p><i>"It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan requires schemes to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications."</i></p>
	62	Bullet three "carbon demand" should read CO ₂ emissions.	Paragraph 4.6	The bullet point is proposed to be reworded.	Para. 5.11, reword bullet point list.
	63	A lot of this text mixes PV and solar thermal technologies. Solar tiles are PV. Wall mounted will normally be PV. A solar array generally refers to PV.	Paragraphs 4.8-4.13	Accept change.	Paras. 5.17-5.21 amended to improve clarity.
	64	2-4 m2 is only a domestic system – what about larger systems?	Paragraph 4.12	Accept change.	Paras. 5.17-5.21, reference to specific size requirements of systems deleted.
	65	Wind energy – 2.5 to 6 kW are not domestic e.g. the 6 kW version sits on a 9m tall mast	Paragraph 4.14	Accept change.	<p>Para. 5.22, amend as follows:</p> <p><i>"Wind turbines create electricity and vary in size and power"</i></p>

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					<p><i>output, ranging from a few hundred watts to 2-3 megawatts. Household systems are typically sized up to 6kW but there are larger turbines of up to 50kW available for larger community scale projects.”</i></p>
	66	<p>Biomass generally refers to solid bio. There are bio oils and bio gases. These might be referred to as biofuels. E.g. anaerobic digester gas, rape seed oil etc.</p>	Paragraph 4.19	Accept change.	<p>Para. 5.28, add:</p> <ul style="list-style-type: none"> • <i>Biomass fuels fall into two main categories:</i> <ul style="list-style-type: none"> - <i>Woody biomass includes forest products, untreated wood products, energy crops and short rotation coppice, which are fast growing trees such as willow.</i> - <i>Non-woody biomass includes animal waste, industrial and biodegradable municipal products from food processing and high energy crops. Examples are rape, sugar cane, maize.</i> • <i>For small-scale domestic applications of biomass the fuel usually takes the form of wood pellets, wood chips or wood logs.</i>

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	67	Ground Source Heat Pumps are not renewable as they are supplied by electricity. However, some local authorities regard the output minus the input as being renewable. This needs to be stated. Using GSHP's in a heating only (or cooling only) application can lead to a degradation in efficiency in the medium term as the ground gradually cools-down (heats-up) reducing efficiency and can even require de-frosting.	Paragraph 4.23	Accept in part.	<p>Para. 5.34, add:</p> <p><i>“Electricity is required to drive the compressor and pump for the transfer of the heat through the pipes. For every unit of electricity used to pump the heat, 3-4 units of heat are produced. Where possible, the Council would seek the installation of solar PV or another form of renewable electricity generating system to power the compressor and pump. The electricity used to operate the system should be set out in the Energy Statement and accounted for in the calculation of overall savings in CO₂ emissions.”</i></p>
	68	CHP – this is mainly about single building applications – there is far too little to encourage community energy schemes (district heating or cooling, private wire etc). The London Mayor’s policy now states that all new developments should connect to any existing CE schemes or start their own CE scheme. To achieve Code for Sustainable Homes levels 5 & 6 will almost certainly require connection to a CE scheme. By adding different building loads together on to one large	Paragraph 4.26	Accept in part.	<p>Add paras. 4.24-4.27:</p> <p><i>“Community energy schemes deliver heat, power, or cooling to more than one building or dwelling, from a central source. Where CHP is the heat source, considerable savings in primary energy (and therefore carbon emissions) can be achieved compared to alternative methods of providing heat and electricity.</i></p>

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		scheme it is possible to introduce more CHP, more economically.			<i>Decentralised energy schemes can be incorporated in both the refurbishment of existing buildings, as well as new build, and can be suitable for all scales of development. Where possible, the opportunity to link a new development to an existing CCHP/CHP system may be the most resource efficient option. If this is not possible, the provision of CCHP/CHP should be considered on a site-wide basis that connects different uses and / or groups of buildings. If a site-wide approach is not possible, CHP / CCHP should still be investigated. This should include renewables where it is technically feasible."</i>
	69	Suggest biomass should be biofuels. Biomass e.g. wood chip CHP has not really worked in the UK yet and only seems to work abroad above about 2 MW.	Paragraph 4.26	Accept change.	Para. 4.21, amend third sentence as follows: <i>"To be a renewable energy technology CHP needs to be powered by biofuels..."</i>
	70	Suggest removing the "24 hours" and just talking about a "consistent heat demand" as many CHP units are economic over 17 hours/day. Night	Paragraph 4.26	Accept change.	Para. 5.21, amend last sentence as follows: <i>"CHP systems are most</i>

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		electricity rates often make night operation uneconomic.			<i>effective in developments where there is a constant heat demand consistently during the year."</i>
	71	Suggest splitting this para into individual building CHP and CE schemes by splitting off the last sentence and building up to emphasise the even greater benefits of community wide schemes. See Carbon Trust - Good Practice Guide 388 for text and examples.	Paragraph 4.26	Accept change.	New section on Community Heating added – paras. 4.24-4.27.
	72	Add CIBSE Guide F - Energy Efficiency In Buildings, CIBSE Technical Memorandum on Renewables, London Renewables Toolkit, DCLG strategic guide to renewables, Good Practice Guide 388 – CHP for buildings, to list of references.	Appendix 2	Accept change.	<p>Additional references added where appropriate within the body of the SPD:</p> <p>CIBSE Guide F: Energy efficiency in buildings, 2004</p> <p>Technical Memorandum 38: Guide on renewable and low carbon energy technologies, produced by BRE in conjunction with CIBSE, published in 2006.</p> <p>'London Renewables Toolkit - for planners, developers and consultants', provides a detailed overview of the renewable energy technologies available, and their appropriateness for different development types, to assist in assessing the feasibility and viability of renewable</p>

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					<p>technologies.</p> <p>http://www.london.gov.uk/mayor/environment/energy/docs/renewables_toolkit.pdf</p> <p>Low or Zero Carbon Energy Sources Strategic Guide, May 2006 (CLG)</p> <p>Carbon Trust Good Practice Guide 388 - Combined heat and power for buildings, published 1 April 2004.</p>
Home Builders Federation Ltd	73	<p>Concerned about the cost of the requirements and their impact on the viability of schemes. Developers already have to contribute to affordable housing, education etc. The demands for on site renewable energy provision and connecting to decentralise renewable energy sources will incur significant costs which will affect the viability of schemes. The Council should, as per paragraph 33 of PPS1 Supplement, provide an estimate of the total likely cost of this burden on developers and the effect on development viability.</p> <p>Paragraph 26 of PPS1 states that planning authorities should not impose disproportionate costs on</p>	General	<p>In accordance with Policy 34, the inclusion of renewable energy technology is expected for major developments unless it can be demonstrated that such provision is not feasible. Impacts on viability would be considered in the assessment of 'feasibility'. Paragraph 5.7 states that strong justification, both technical and economic, will be required from developers will be required if they do not think they can meet the 10% requirement.</p> <p>Government guidance and planning case law make clear how policy and other considerations should be weighted in making decisions on planning applications. However, climate change and sustainable development is at the heart of Government, regional and the Council's priorities and should also be central to the design of developments.</p>	No change.

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		developments and should have regard to resources available and the likely costs incurred, and be realistic about what can be implemented over the period of the plan.			
	74	Many aspects of the SPD are unnecessary given that many issues will be addressed in time through compliance with gradually higher levels of the Code for Sustainable Homes (including Lifetime Homes at level 6) by 2016. It would be more sensible if the Council focused its resources on helping deliver priorities such as affordable homes and transport infrastructure.	General	The SPD has an important role in providing guidance on the interpretation and application of policies in respect of climate change. Climate change is becoming an increasingly high priority for the Government and for the Borough. The need to reduce CO ₂ emissions has been made clear with global, national and regional targets set, as well as targets for the amount of energy generated from renewable sources. The SPD sets out the Council's commitment to achieving sustainable development through the planning process.	No change.
	75	PPS: Planning and Climate Change (supplement to PPS1) is clear that the setting of 'blanket' targets at borough wide level, for both decentralised energy and the Code, as this document attempts to do is impermissible (para. 33). Any local target set should have regard for site viability and the need to sustain housing construction.	General	<p>The Council's policies were the subject of recent scrutiny by the UDP Inspector who supported the UDP policies including the 10% minimum target. The London Plan's higher target of 20% was supported by the Examination Panel more recently and this was accepted by Government (GOL) and duly included in the altered London Plan published in February 2008.</p> <p>Paragraph 8 of PPS22 states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy technology. The companion guide to PPS22 suggests that it may be appropriate to set out specific targets for on-site generation (expressed as a minimum level).</p>	No change.

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				<p>Paragraph 19 in the supplement to PPS1 (Planning and Climate Change), states that in developing their core strategy <u>and supporting local development documents</u>, planning authorities should provide a framework that promotes and encourages renewable and low carbon energy generation. Paragraph 20 goes on to state that planning authorities should, amongst other things, expect a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon energy sources.</p> <p>The Council is encouraging and promoting Code Level 3, in line with the Energy Saving Trust's minimum recommendation. Furthermore, the Government's Building a Greener Future Policy Statement confirms the Government's intention for all new homes to be zero carbon by 2016. By 2010 all new homes will need to meet the carbon standard for Code Level 3. Planning permissions are valid for 3 years which means of the developments approved from 2008 onwards are likely to be under construction from 2010. The SPD is therefore completely in line with the Government's aspirations.</p>	

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	75	<p>Questions why this document is trying to specify levels of the Code when the house building industry already supports the timetable for the Code as set out in 'Building a Greener Future'.</p> <p>Compliance with the Code is not a planning matter. Currently the Code remains voluntary, and the Council cannot stipulate compliance at any level (as it attempts in paragraph 2.7). The Council should adopt a more flexible and encouraging stance by working with developers to identify where and when rating of the Code might be achievable taking into account other strategic objectives such as the delivery of affordable housing and/or infrastructure and the total planning obligation will affect development viability.</p>	General	<p>In order to provide clarity about the meaning of the UDP policy it is appropriate to refer to levels in the Code.</p> <p>The Code for Sustainable Homes covers a range of environmental issues, such as water, waste and minerals, whereas the mandatory Building Regulations standards proposed in 'Building a Greener Future' relate only to carbon performance.</p> <p>The Council is encouraging and promoting Code Level 3, in line with the Energy Saving Trust's minimum recommendation. The Code is an effective means of certifying the overall sustainability of new developments.</p> <p>The Government's Building a Greener Future Policy Statement confirms the Government's intention for all new homes to be zero carbon by 2016. By 2010 all new homes will need to meet the carbon standard for Code Level 3. Planning permissions are valid for 3 years; many of the developments approved from 2008 onwards are likely to be under construction from 2010. The SPD is therefore completely in line with the Government's aspirations.</p>	No change.
	76	Setting simple and achievable benchmarks and encouraging developers to reach or exceed these standards, or collaborating with them to help achieve this would be the most constructive way forward.	General	This is what the SPD is doing and will help to achieve Government and regional objectives in practice.	No change.
	77	Planning obligations should not be used to secure compliance with higher	Paragraph 2.4	In experience to date the use of S106 Agreements has been the most appropriate way to ensure	No change.

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		<p>levels of the CSH in advance of the national timetable. The use of obligations could never reasonably be deemed as 'necessary' in planning terms to meet the needs of new development and so this would be contrary to the tests and requirements of Circular 5/2005.</p> <p>This hardly represents the most effective use of contributions given the costs associated with delivery Code Level 3. Instead, the HBF recommend any additional available resource through planning obligations would be better concentrated on delivering affordable housing and vital infrastructure, while allowing the house building industry to gradually manage the transition towards delivering Code 3 by 2010.</p>		<p>securing sustainability / renewables measures as these can involve a degree of complexity and interdependence which cannot be readily expressed or achieved through conditions. There is alignment between this SPD and the S106 Planning Obligations SPD.</p> <p>It is very unlikely financial contributions would be used to deliver a particular Code Level. S106 Agreements are and will be used to ensure the development is completed to a specified Code Level standard and set out specified actions in providing evidence that this has been achieved.</p>	
	78	The draft SPD should have regard for paragraph 33 of the Supplement to PPS1.	Paragraph 2.5	Noted. The guidance set out in PPS1 and the Supplement has been taken into account in drafting the SPD.	No change.
	79	The best stratagem would be to allow the industry to make a gradual transition towards higher levels of the code, which includes Lifetime Homes as a component of level 6, instead of trying to force its pace and placing housing delivery in jeopardy by making development unviable.	Section 3	The Council is encouraging and promoting Code Level 3. It is not considered that the guidance set out in the SPD, and in particular the Code Level 3 aspiration for all new dwellings, would jeopardise development coming forward. Impacts on the viability of a development would be considered in the assessment of any application.	No change.
	80	The guidance seeks to maximise the	Paragraphs	The guidance encourages the salvaging of recyclable	No change.

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		<p>volume of recycled construction waste. Since DEFRA has not yet done so, it would be helpful if Lambeth could define what materials constitute construction waste so that developers may be able to assess whether this is likely to be viable without harming housing delivery and quality.</p>	3.38-3.46	<p>materials during demolition and the use of recycled materials in construction. It is not considered essential to define what materials constitute construction waste but guidance is available from London Renewable and the Waste and Resources Achieve Programme whose contact details are included in the SPD.</p>	
	81	<p>The prescription of minimum percentages for the incorporation of certain types of micro-renewable energy technologies is neither constructive nor beneficial in helping to tackle the long-term challenge of climate change.</p> <p>The best way to improve energy efficiency of new housing stock and promote renewable energy is through innovations in materials and technology development and the economies of scale available to house builders to incorporate the best of these new technologies in the construction process. Lambeth's proposal for all major developments to meet 10% of its energy requirements from renewable sources could fragment efforts to achieve economies of scale and prevent a concerted focus from the supply chain in developing the most promising new products efficiently.</p>	Page 14	<p>The inclusion of targets for renewable energy generation on site is well established, particularly within the Merton Rule and the Government has recognised and supported this.</p> <p>The UDP sets out the 10% requirement. The London Plan sets out a similar requirement, but has a target of 20%. In both cases the requirement is subject to feasibility.</p> <p>Paragraph 8 of PPS22 states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy technology. The companion guide to PPS22 suggests that it may be appropriate to set out specific targets for on-site generation (expressed as a minimum level).</p>	No change.

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		<p>It is not sensible to set a percentage of renewable sources of any size of development given the current state of the micro-renewables market.</p> <p>Negotiating lower carbon dioxide emissions which can be measured using Energy Performance Certificates and which also allow the developer the chance to build some of this requirement into the envelope of the building so that it lasts for the life of the dwelling should be considered.</p> <p>Micro-renewables are best incorporated by house builders on a systematic basis, as part of their general output, allowing house builders, clients and purchasers to benefit from supply chains and economies of scale that can reduce the cost; therefore HBF suggest they should not be the property for planning obligations.</p>			
	82	<p>Any considerations of feasibility should be considered as part of Lambeth's emerging Core Strategy as it will affect the Council's 5 year land trajectory of developable and deliverable sites.</p> <p>If access to decentralised energy is not possible, neither this SPD or any policy</p>	Section 4	<p>The Council has over 6 years identified housing supply and housing supply, as well as the operation of policies, is monitored on an annual basis through the Annual Monitoring Report.</p> <p>The feasibility of supplying a proportion of a development's delivered energy requirement from renewable sources may depend on technical issues,</p>	No change.

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		<p>in a DPD should be used to obstruct housing delivery. Any local target set should have regard for site viability and the need to sustain housing construction.</p> <p>Paragraph 33 of the Supplement to PPS1 makes it quite clear that the setting of 'blanket' targets at borough wide level, for decentralised energy is impermissible, and in HBF's view, this would be inconsistent with the requirement placed on the council to ensure a supply of deliverable and developable sites for housing.</p> <p>The draft SPD should better reflect the guidance in paragraph 26 or the Supplement to PPS1 which states that local authorities should have an evidence based understanding of the local feasibility and potential for renewables in their area.</p>		<p>financial issues, or both. The SPD is clear that developers will be expected to demonstrate that they have explored all renewable energy options for a particular development.</p> <p>The inclusion of targets for renewable energy generation on site is well established, particularly within the Merton Rule and the Government has recognised and supported this.</p> <p>The UDP sets out the 10% requirement. The London Plan sets out a similar requirement, but has a target of 20%. In both cases the requirement is subject to feasibility.</p> <p>Paragraph 8 of PPS22 states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy technology. The companion guide to PPS22 suggests that it may be appropriate to set out specific targets for on-site generation (expressed as a minimum level).</p>	
	83	<p>The draft SPD should give some consideration to issues of fuel security for its residents and it should think through the financial impact on communities should decentralised energy strategy fail and residents have to pay premiums to re-connect to nation grid supply.</p>	General	<p>The UDP policies and the SPD focus on minimising energy use and seek a proportion of energy through on-site renewables. This will reinforce fuel security. Decentralised networks, if and when they are introduced, will need to take into account robustness of their operation.</p>	No change.

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Association for the Conservation of Energy	84	The Supplement to PPS1 (Planning and Climate Change) indicates that any targets for carbon emissions / energy in buildings should be in a DPD rather than an SPD.	General	Noted. The UDP sets out the 10% requirement. The London Plan sets out a similar requirement, but has a target of 20%. In both cases the requirement is subject to feasibility.	No change.
	85	Do you have your "Merton Rule" targets in any DPD documents? Does the Mayoral regional policy of 20% carbon emission saving count? Does your 10% target fit with the Mayor's policy? If this DPD v SPD issue is enforced, it puts the status of emerging SPDs which cover energy targets into some kind of limbo.	Section 4	Policy 34 in the UDP sets out the Council's requirement for all major developments to incorporate equipment for renewable energy generation so as to provide at least 10% of their predicted energy requirements (to be assessed in terms of CO ₂ emissions). It is entirely appropriate and necessary for this SPD to be produced to provide guidance on the interpretation and application of UDP policies. This is in accordance with Government guidance in PPS12 and Regulations governing the process and status of development plan policies and SPDs.	No change.
	86	The Supplement to PPS1 states that LPAs cannot specify low-carbon materials to be used in construction – this is a role for Building Regulations.	Paragraphs 3.16-3.21	The SPD sets out guidance to maximise the use of materials with minimum environmental impact.	No change.
	87	Be aware of the pending revision to permitted development rights to encompass microgeneration.	Section 5	Noted. Section 5 (now Section 6) has been updated in light of amendments to permitted development legislation which came into force in April 2008.	Section 6, amend to reflect the provisions of the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2008.
	88	BREEAM will eventually be replaced in new build by a non-domestic version of the Code for Sustainable Homes. Suggest adding that BREEAM, or an equivalent mandatory building code of	Section 2	Accept change.	Para. 3.4, amend as follows: <i>"The Council's preferred methodology for new build and refurbishment is the BREEAM</i>

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		a similar level of environmental performance or higher, will be acceptable.			<i>system of certification, or an equivalent mandatory building code of a similar level of environmental performance or higher for non residential development, and the use of the Code for Sustainable Homes for residential development.”</i>
	89	Clarify what is meant by the “energy demand of the building”.	Section 3	Accept change. This has been clarified in paragraphs 3.12 and 3.13.	<p>Para. 3.12, add:</p> <ul style="list-style-type: none"> <i>A calculation of baseline energy demand, demonstrating the projected annual heating, cooling and electricity demand of the development. The assessment must show the carbon dioxide emissions resulting from the predicted energy use;</i> <p>Para. 3.13, add:</p> <p><i>“Part L of the current Building Regulations will be used as the minimum benchmark and the starting point for the assessment. Ideally, Standard Assessment Procedure (SAP) (for domestic developments) and Simplified Building Energy Model (SBEM) (for non-residential developments)</i></p>

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					<i>ratings / calculations should be provided at application stage to support the assessment. SAP and SBEM are methods of assessing energy efficiency ratings in new residential and non-residential buildings. The Code for Sustainable Homes benchmark should be used to calculate carbon dioxide emissions for appliances and cooking."</i>
Greater London Authority	90	The document is written in a technical manner that assumes a large amount of knowledge. Perhaps further iterations of the document could be written in a more simplified manner.	General	Best endeavours have been made to ensure the guidance in the SPD is written in 'plain English' style. Where technical terms are used these have been explained.	Various changes have been incorporated into the document to improve clarity.
	91	There should be more of a reference to London Plan policies throughout the document. In particular, the Mayor's energy hierarchy set out in the London Plan should be better reflected. The draft SPD is heavily weighted towards the use of renewable energy.	General	Accept change. Relevant London Plan policies are listed in Table 1. Reference has been made in the SPD to the Mayor's Energy Hierarchy as set out in London Plan Policy 4A.1 and maximising energy efficiency in the first place has been emphasised.	Table 1, add reference to London Plan Policies. Paras. 4.17 and 5.6, add: <i>"The Council supports the hierarchy, as set out in the London Plan (Policy 4A.1):</i> <i>1. Using less energy, in particular by adopting sustainable design and construction measures;</i> <i>2. Supplying energy efficiently, in particular by prioritising decentralised energy generation and;</i>

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					<p><i>3. Using renewable energy.”</i></p> <p>Paras. 4.15, 4.18 and 5.7, additional text included to reiterate the importance of the energy savings that can be achieved through the inclusion of energy efficiency measures.</p>
	92	There are various points in the document where the numbering is not correct.	General	This has now been corrected.	Section and paragraph numbers corrected.
	93	The SPD should mention that the Code for Sustainable Homes only applies to new residential development. Refurbishment is still governed by Ecohomes XB Assessment.	Table 1	Accept change.	<p>Para. 3.8, add:</p> <p><i>“In April 2007 the Code for Sustainable Homes replaced EcoHomes for the assessment of new housing. EcoHomes 2006 continues to be used for refurbished housing.”</i></p>
	94	Update reference to the London Plan to refer to the Consolidated with Alterations since 2004 version (February 2008).	Table 1	References to the London Plan throughout the document have been amended to relate to the latest iteration “consolidated with Alterations since 2004”, published in February 2008.	Reference to the London Plan updated to refer to the Consolidated with Alterations since 2004 version (February 2008).
	95	This should also reference London Plan targets.	Paragraph 2.3	Accept in part.	<p>Para. 5.5, add:</p> <p><i>“It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10%</i></p>

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					<i>through on site renewable energy generation, Policy 4A.7 in the London Plan requires schemes to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications. ”</i>
	96	Table 3 should reflect the energy hierarchy as set out in the London Plan and the Mayor’s Energy Strategy and should also refer to the following: <ul style="list-style-type: none"> • Aspect / orientation • SUDS • Green roofs / walls • Recycling / waste disposal and treatment 	Table 3	Accept change.	Add to Table 3: <ul style="list-style-type: none"> • Aspect / orientation • SUDS • Green roofs / walls • Recycling / waste disposal and treatment
	97	Why is ‘water’ unticked in the table?	Table 3	Accept change.	Table 3, insert ‘tick’ next to ‘water management’.
	98	The requirements and principles in the London Plan (Chapter 4A) and UDP/LDF documents should be the starting point for any application. Measures that achieve BREEAM standards must be consistent with these policies. Additionally this paragraph should clarify that the ‘preferred methodology for new build and refurbishment’, stated to be BREEAM is for non-residential developments.	Paragraph 2.4	It is considered that BREEAM standards are the appropriate generally accepted standards and that this is the most effective way to achieve the objectives of the UDP policies. Clarification that this applies to non-residential proposals will be added.	Para. 3.4, amend first sentence as follows: <i>“The Council’s preferred methodology for new build and refurbishment is the BREEAM system of certification, or an equivalent mandatory building code of a similar level of environmental performance or higher for non residential development, and the use of the</i>

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					<i>Code for Sustainable Homes for residential development.</i>
	99	Should also mention the need to comply with London Plan requirements.	Paragraph 2.5	Not considered appropriate here. Reference to London Plan policies has been made elsewhere in the SPD.	No change.
		Add 'For monitoring and review purposes' after 'completion of the development'. Additionally, standards of the Code for Sustainable Homes are usually referred to by 'levels' rather than 'stars'.	Paragraph 2.7	Accept change. The CLG guidance document refers to sustainability ratings as Code 'Levels' as well as 'Stars'. Each Code Level is represented on the certificate by an equivalent number of Stars (from 1 to 6). However, it is accepted that the scoring system relates to the achievement of performance levels.	Para. 3.6, add: <i>"...for monitoring and review purposes".</i> Throughout the SPD change reference to "stars" to "Code Levels".
	100	Site Appraisal – the relevant UDP biodiversity policies should be referenced here, since there are national regulations that set out issues to consider in relation to habitat surveys and species protection that can affect development.	Paragraph 3.4	Accept change.	Para. 4.5, add: <ul style="list-style-type: none"> <i>Biodiversity (Policy 52)</i>
	101	An additional bullet point is required for flooding and the need for a Flood Risk Assessment.	Paragraph 3.6	Accept change.	Para. 4.7, add: <ul style="list-style-type: none"> <i>Flood risk – the appraisal should identify whether the development is located within an area at risk of flooding (flood zones), with reference to the Council's Strategic Flood Risk Assessment. A separate Flood Risk Assessment may be required. The risks of all forms of flooding to and from</i>

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					<i>the development should be assessed and applicants should demonstrate how those risks will be managed.</i>
	102	An additional bullet point should make reference to flooding.	Paragraph 3.11	Accept change.	<p>Para. 4.14, add:</p> <ul style="list-style-type: none"> <i>Flood risk – development proposals within flood zones should take into account the flood risk vulnerability of land uses and follow the sequential approach as outlined in PPS25 and its practice guidance. Site layout is also an important consideration when designing sustainable drainage systems.</i>
	103	The paragraph covering flexibility is in relation to changing demands from buildings and adaptation in relation to predicted weather patterns under climate change. It may be clearer, in policy terms, if the former and the latter were separated into different paragraphs. This should result in better outcomes in relation to implementation.	Paragraph 3.11	Accept change.	Para. 3.11, separate into two paragraphs (4.12-4.13).
	104	The paragraph does not sufficiently address London Plan policies under Policy 4A.9 'Adaptation to Climate Change' and 4.10 'Overheating'. Whilst passive solar gain is beneficial,	Paragraph 3.11	Accept in part.	<p>Para. 4.11, amend first sentence as follows:</p> <p><i>"All new build development in the borough should seek to</i></p>

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		increasingly the issue is one of overheating. Therefore, there is a need for balance that does not come across strongly enough in this paragraph.			<p><i>utilise passive solar design to maximise natural daylight, energy from the sun to heat the building, and natural ventilation. Development should also be designed so as to avoid internal overheating and reduce the heat island effect.”</i></p> <p>Para. 4.14, amend ‘Building orientation’ bullet point as follows:</p> <ul style="list-style-type: none"> <i>Building orientation – wherever possible, subject to urban design considerations, buildings should be oriented to minimise summer and maximise winter solar gain (e.g. through the use of trees and other shading, maximising natural ventilation, also see reference to urban green space below);</i>
	105	The bullet point on urban green space should make reference to the ability to make provision for amenity open space on balconies and roof terraces for flats. There should also be a reference to green roofs (London Plan policy 4A.11, Living Roofs and walls)	Paragraph 3.11	Accept in part.	<p>Para. 4.14, add to ‘Incorporation of urban green space’ bullet point:</p> <p><i>“The inclusion of green and brown roofs can further help in mitigating the heat island effect.”</i></p>

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		and the Children and Young People's Play and Informal Recreation SPG.			
	106	Natural ventilation – The draft SPD should reference the latest guides on the subject e.g. from CIBSE (Chartered Institute of Building Services Engineers).	Paragraph 3.15	Accept change.	Para. 4.19, add: <i>“Further guidance on natural ventilation in non-residential buildings is provided by the Chartered Institute of Building Services Engineers – ‘Natural Ventilation in Non-Domestic Buildings’ (CIBSE 2005).”</i>
	107	Remove the word ‘try’.	Paragraph 3.18	Accept change.	Para. 4.31, remove the words “try to”.
	108	Consideration of the materials impacts through the whole life cycle also relates to the operational phase and of particular importance are the running costs, maintenance regimes and cleaning of materials used in buildings.	Paragraph 3.19	Accept change.	Para. 4.32, amend third sentence as follows: <i>“This means that consideration needs to be given to the operational aspects of buildings such as running costs, maintenance regimes and cleaning of materials used, as well as what happens to the materials at the end of the life of the building..”</i>
	109	The section on materials would benefit from clearly setting out, in separate paragraphs, the principles involved in sustainable resource use i.e. embodied energy; sustainable procurement (impacts on the environment via toxicity and extraction, over-consumption, fragile habitats and	Paragraph 3.20	The Council considers the existing guidance in the SPD is at an appropriate level for its purpose to provide guidance on the interpretation and application of UDP policies.	No change.

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		wastes generated); and disassembly of building components. Whilst the references to FSC, the BRE's Green Guide to Specification, London Remade and WRAP are welcome – the paragraph would be improved by setting out its expectations from developers and more detailed guidance on the principles outlined above.			
	110	This paragraph has no targets for the use of water in developments. In terms of residential targets, these can be found under Policy 4A.16 ('Water supplies and resources') of the London Plan and exist in the levels of the Code for Sustainable Homes, which the SPD states in its introductory paragraphs that development must achieve.	Paragraph 3.25	Add reference to Code for Sustainable Homes targets.	Para. 4.41, add: <i>"The Council sees Code Level 3 as a minimum standard and aspires to level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day."</i>
	111	There should be reference to PPS25.	Paragraph 3.27	A reference to PPS25 Development and Flood Risk has been added to Table 1 listing relevant national and regional guidance.	Table 1, add: <i>PPS25 – Development and Flood Risk</i>
	112	Perhaps the wording could be stronger here e.g. Haringey Council has had some success in using development control powers for this issue.	Paragraph 3.28	This is covered by the Residential Alterations and Extensions SPD.	No change.
	113	The draft SPD should be stronger on the requirement for SUDS in an urban context. Stating that 'applicants are encouraged' is not adequate given the new policy context in London Plan policy 4A.14 'Sustainable drainage',	Paragraph 3.30	Accept change.	Para. 4.46, amend as follows: <i>"Applicants are expected to demonstrate how sustainable urban drainage systems will be incorporated into development</i>

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		which outlines a drainage hierarchy that boroughs should follow to manage surface run-off.			<i>proposals to reduce the risk of flooding, unless there are practical reasons for not doing so. SUDS are not suitable for use in all areas, for example high ground water levels or clay soils which do not allow free drainage. In such cases, the developer should seek to manage as much run-off as possible on site and explore sustainable methods of managing the remainder as close as possible to the site."</i>
	114	There should be reference to CIRIA's website.	Paragraph 3.31	Accept change.	Para. 4.48, add reference: http://www.ciria.org/suds/
	115	The draft SPD should recognise the London Plan policy 4A.11 on Living Roofs to make the paragraph stronger.	Paragraph 3.32	It is not considered necessary or appropriate to set out all relevant policies contained within the London Plan in the SPD. This is an SPD to the Lambeth UDP and not the London Plan. References to the London Plan have however been added where they are relevant to the interpretation and application of UDP policies. However paragraph 3.33 has been re-worded to improve clarity.	Para. 4.50, amend as follows: <i>"The guidance applies to all new and existing buildings in the borough. The Council strongly encourages the incorporation of living roofs and walls in the design of new buildings or adaptation of existing buildings where feasible."</i>
	116	The draft SPD should also reference the Living Roofs and Walls report (Living Roofs and Walls, Technical Report: Supporting London Plan Policy, February 2008).	Paragraph 3.35	Accept change.	Para. 4.52, add reference: <i>"The Living Roofs and Walls report (Living Roofs and Walls, Technical Report: Supporting London Plan Policy, February</i>

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					<i>2008) considers the benefits and barriers to implementing living roofs and walls, and also provides indicative costs and case studies."</i>
	117	Species bullet point – wording could be added to the effect of 'what species is the developer trying to encourage with the implementation of the green roof'.	Paragraph 3.37	This is considered to be adequately addressed by the SPD.	No change.
	118	Demolition, Waste and Recycling: The section could benefit from setting out the waste hierarchy in line with the London Plan waste policies and the Mayor's Municipal Waste Management Strategy. Reference could also be made to the Mayor's draft Business Waste Strategy which has a new waste hierarchy, see figure 1 in http://www.london.gov.uk/gla/publications/environment/bwms-draft.pdf .	Paragraphs 3.38-3.46	Accept in part. Reference is made to UDP Policy 56 which sets out the waste hierarchy.	Para. 4.56, add reference to Policy 56 'Waste'. Para. 4.57, add: <i>"UDP Policy 56 sets out the preferred method of waste management, the Waste Management Hierarchy. Applicants should demonstrate that developments minimise the level of waste generated, increase re-use and recycling and composting of waste, and reduce landfill disposal. Where waste cannot be recycled, the production of energy from waste using new and emerging technologies is encouraged."</i>
	119	Perhaps the economic development policies of Lambeth's UDP should be listed here, since waste is / will be an increasingly large sector of the (green) economy.	Paragraph 3.39	The primary purpose of the SPD is to provide guidance on the interpretation and application of UDP policies on sustainable design and construction and reference to economic development policies are not considered to be appropriate in this context.	No change.

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	120	Targets / standards should be included here. These can be found in the Mayor's SPG Sustainable Design and Construction (Section 2.3.3 Materials).	Paragraph 3.41	Accept in part. A cross-reference to the London Plan SPG Sustainable Design and Construction has been added.	<p>Para. 4.30, add:</p> <p><i>"Section 2.3.3 of the London Plan Supplementary Planning Guidance: Sustainable Design and Construction, sets out detailed guidance, standards and the specification of materials."</i></p>
	121	A link to the ICE's Demolition Protocol, would perhaps be more suitable.	Paragraph 3.43	Accept change.	<p>Para. 4.60, include link to the Institute of Civil Engineers website – www.icenet.org.uk</p>
	122	<p>This paragraph should be expanded with more detailed guidance and requirements e.g. use of Considerate Contractors' Schemes and adherence to London Councils / Mayor's Best Practice Guide on the control of dust and emissions from demolition (and construction) of builders.</p> <p>Additionally, does 'on-site contamination' include invasive species, which may exist on site? The Environment Agency is particularly concerned about this issue.</p>	Paragraph 3.46	Accept change.	<p>Para. 4.63, add:</p> <p><i>"Developers are encouraged to sign up to the Considerate Contractor's Scheme. The Council also encourages adherence to the Mayor and London Council's Best Practice Guidance on the control of dust and emissions from construction and demolition, which is available on the GLA website: http://www.london.gov.uk/mayor/environment/air_quality/construction-dust.jsp"</i></p> <p>Para. 4.64, add bullet point:</p> <p><i>"Management of invasive species. The Environment Agency has produced good</i></p>

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					<i>practice guidance on the management of invasive species, including Japanese Knotweed, on development sites. Refer to www.environmentagency.gov.uk for further information).</i> "
	123	Guidance could also be included on the use of environmental management systems to enable larger developers and contractors to comprehensively manage the process and reduce environmental impacts.	Paragraph 3.46	Larger developers and contractors should already have these systems in place.	No change.
	124	Renewable energy / technologies section: This section does not make mention of combined heat and power / combined cooling, heat and power (CHP / CCHP) or heat networks. London Plan Policies 4A.4, 4A.5, 4A.6, 4A.7 and 4A.8 should be referred to in re-drafting this section of the SPD.	Section 4	Accept change.	Para. 5.4, add: <i>"London Plan policies 4A.4 - 4A.8 set out the Mayor's approach to sustainable energy."</i> Add paras. 4.24-4.27: <i>"Community energy schemes deliver heat, power, or cooling to more than one building or dwelling, from a central source. Where CHP is the heat source, considerable savings in primary energy (and therefore carbon emissions) can be achieved compared to alternative methods of providing heat and electricity."</i>

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					<i>Decentralised energy schemes can be incorporated in both the refurbishment of existing buildings, as well as new build, and can be suitable for all scales of development. Where possible, the opportunity to link a new development to an existing CCHP/CHP system may be the most resource efficient option. If this is not possible, the provision of CCHP/CHP should be considered on a site-wide basis that connects different uses and / or groups of buildings. If a site-wide approach is not possible, CHP / CCHP should still be investigated. This should include renewables where it is technically feasible."</i>
	125	The efficiency section in the SPD is small in comparison to the renewables section. The energy hierarchy should form the basis of the energy section with renewables being the final contributor to carbon reductions.	General	Accept change.	Para. 4.17 and 5.6, add reference to Energy Hierarchy. Paras. 4.15, 4.17, 4.18 and 5.7, additional text to reiterate the importance of the energy savings that can be achieved through the inclusion of energy efficiency measures.
	126	The numbering in this section is wrong	Section 4	The numbering has now been corrected.	Numbering corrected.

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		as the paragraph numbers still begin with 3.			
	127	The SPD stems from the Lambeth UDP which requires a 10% carbon dioxide reduction as opposed to the 20% requirement in Policy 4A.7 of the London Plan. Policy 4A.4 of the London Plan should be used as the starting point to establish whether applications are consistent with borough's energy policies.	Paragraph 3.2	Accept in part. The SPD relates to the interpretation and application of UDP policies, however reference to the London Plan figure has been added.	<p>Para. 5.5, add:</p> <p><i>“It should be noted, that whilst Council policy is that developments will achieve a minimum reduction in carbon dioxide emissions of 10% through on site renewable energy generation, Policy 4A.7 in the London Plan requires schemes to achieve a 20% reduction. For applications referable to the Mayor, applicants should meet the 20% requirement. The Council encourages and supports this aim for all applications.”</i></p>
	128	It should be noted and emphasised within the SPD that the onus lies with the developer to demonstrate why it is considered unfeasible to deliver the renewables requirement, supported by evidence.	Paragraph 3.4	Accept change.	<p>Para. 5.9, add:</p> <p><i>“Developers will be expected to demonstrate that they have explored all renewable energy options for a particular development. Strong justification from developers, both technical and economic, will be required if they do not think they can meet the 10% requirement. If it is believed not to be feasible to provide the applicable target proportion of</i></p>

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					<i>renewable energy in a particular development, developers will be expected to explain their reasoning and to include in their proposals the proportion they judge is feasible."</i>
	129	Bullet point two should read: 'The total energy demand and associated carbon dioxide emissions'.	Paragraph 3.6	Accept change. It is proposed to reword this bullet point.	<p>Para. 5.11, amend bullet point as follows:</p> <ul style="list-style-type: none"> <i>A calculation of baseline energy demand, demonstrating the projected annual heating, cooling and electricity demand of the development. The assessment must show the carbon dioxide emissions resulting from the predicted energy use;</i>
	130	Bullet point three should be reworded as follows: 'How 10% of the carbon dioxide emissions from expected energy use will be displaced by the technology' (acknowledging the fact that 10% should now be 20%).	Paragraph 3.6	Accept in part. It is proposed to reword this bullet point.	<p>Para. 5.11, amend fourth bullet point as follows:</p> <ul style="list-style-type: none"> <i>Details of renewable energy technologies to be incorporated in the development, demonstrating that carbon dioxide emissions from expected energy use will be reduced by a minimum of 10% (the London Plan target is 20%) through on site renewable energy generation;</i>

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	131	The implementation of solar PV is pre-empted in the way the paragraph reads and such a document should not pre-empt the market or provide grounds for developers to justify the non-use / implementation of PV as a renewables option. This is repeated in more than one instance for other renewable options also. The SPD does not consider the ways in which both solar PV and green roofs can be combined to achieve sustainable design.	Paragraph 3.8	Accept change. Reference to the relative cost of technologies has been deleted from the SPD. A cross-reference to the Energy Saving Trust website and in the Renewables Toolkit has been provided. Paragraph 5.15 recognises that PV can be incorporated with living roofs.	Section 5, delete references to relative costs and include cross-reference to the GLA's London Renewables Toolkit and the Energy Saving Trust website.
	131	The paragraph refers to the Energy Saving Trust as a reference point. The London Renewables Toolkit could also be mentioned, which is soon to be replaced by the Low Carbon Designer (June 2008). It should also be noted that the GLA are currently in the process of revising the Sustainable Design and Construction SPG and are also producing a Renewables SPG.	Paragraph 3.8	Accept change.	Para. 5.14, include cross-reference to the GLA's 'London Renewables Toolkit - for planners, developers and consultants'. Para. 5.15, add: <i>"The London Energy Partnership is also developing a low carbon design toolkit to provide support on all aspects of sustainable energy, including energy efficiency."</i>
	132	This paragraph only refers to wood biomass technology. It should be noted that wood is only one form of biomass.	Paragraph 3.15	Accept change.	Para. 5.28, add: <ul style="list-style-type: none"> • <i>Biomass fuels fall into two main categories:</i> <ul style="list-style-type: none"> - <i>Woody biomass includes forest products, untreated</i>

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					<p><i>wood products, energy crops and short rotation coppice, which are fast growing trees such as willow.</i></p> <p><i>- Non-woody biomass includes animal waste, industrial and biodegradable municipal products from food processing and high energy crops. Examples are rape, sugar cane, maize.</i></p> <ul style="list-style-type: none"> <i>• For small-scale domestic applications of biomass the fuel usually takes the form of wood pellets, wood chips or wood logs.</i>
	133	<p>This paragraph is confusing. The fourth sentence should make reference to both heat and hot water demand. Heat networks should be mentioned as these can spread heat load to more than one site. A popular model to manage energy delivery is ESCos (Energy Service Companies) and MUSCos (Multi Utility Services Companies).</p>	Paragraph 3.15	Accept change. Reference to heat networks added.	<p>Para. 4.21, amend. Para. 4.25, add:</p> <p><i>“Heating networks offer a potential heat market and heat can be sold to neighbouring buildings or development thereby earning income for a building operator or a community Energy Services Company (ESCO) and have cost benefits.”</i></p>