

Objection Summaries and Responses: Revised Draft Sustainable Building Design and Construction Supplementary Planning Document

<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Thames Water	17	1	<p>Premises involved in the preparation / cooking of food. Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of fats, oils and grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. 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.</p>	<p>Comments noted. However, the nature of the subject matter is considered too detailed for inclusion in the SPD.</p>
Environment Agency	34	1	<p>pg7 The requirement for BREEAM excellent standard is not sufficient. Swindon is an area we have now classified to be in serious water stress. We have classified this area</p>	<p>There is indeed a difference between the Code for Sustainable Homes (CSH) and BREEAM in that the CSH includes mandatory standards. However, the CSH/BREEAM standards within the SPD have now been made aspirational as a result of</p>

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				based on current and future water demand, and rainfall in our 2007 report. Therefore it is important that all new development meets minimum standards for water efficiency in this area. The BREEAM level does not set a minimum standard for water efficiency and a developer could reach this level without including water efficiency measures.	the Building a Greener Future policy statement. The SPD will highlight the importance of sustainable water management.
Environment Agency	34	2	pg7	It is important that all development meets minimum standards for water efficiency in this area. The BREEAM level does not set a minimum standard for water efficiency and a developer could reach this level without including water efficiency measures.	There is indeed a difference between the Code for Sustainable Homes (CSH) and BREEAM in that the CSH includes mandatory standards. However, the CSH/BREEAM standards within the SPD have now been made aspirational as a result of the Building a Greener Future policy statement. The SPD will highlight the importance of sustainable water management in new development.
Environment Agency	34	3	pg15	We object to the standard that peak run-off rates and annual volumes of run-off post development will be no greater than previous	The section on surface water runoff replicates the standard set out in the Code for Sustainable Homes. It is recognised, however, that there may be opportunities on some sites to

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				<p>conditions for the site. It would be more useful to developers if the SPD made it clear that where possible, we will require a reduction in run-off rates for all major developments. Developers will need to provide details of their SUDS scheme prior to determination, and where a reduction is not possible they will need to demonstrate why this is the case.</p>	<p>provide further reductions in runoff. This will be reflected in the supporting text.</p>
Wiltshire Wildlife Trust	38	1		<p>We have concerns that developers will see that they may be able to negotiate out of meeting the standard - the standard should be such that meeting it is easier than negotiating a solution.</p>	<p>Swindon has high sustainability ambitions and these are reflected in the aspirational targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.</p>
Wiltshire Wildlife Trust	38	2		<p>The Swindon Standard also includes optional points for 'responsible sourcing of materials'. This</p>	<p>Both BREEAM and Code for Sustainable Homes standards include consideration of materials. Full guidance is included in the technical</p>

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				has not been defined, and should include the use of locally sourced materials from local suppliers, to reduce carbon emissions.	guidance related to both standards.
Wiltshire Wildlife Trust	38	3		Whilst the increased percentage (20% renewable energy) is to be supported, we would argue that, in light of the Draft Supplement, incremental increases are retained within the document.	The 20% low/zero carbon energy target is underpinned by the findings of Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.
Wiltshire Wildlife Trust	38	4		It is regrettable that the scope of the SPD is not widened to apply to smaller developments below the proposed thresholds, or to extensions/other building modifications. In the future, when the SPD may be revised, we would support the inclusion of these types of development to ensure that all development in Swindon strives to meet the carbon neutral target of 2016.	The revised SPD will only apply to major developments. This requirement captures the majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.
Wiltshire Wildlife Trust	38	6		There has been no specific mention of environmental	The SPD uses the Code for Sustainable Homes as a basis for

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				management of a development site, although construction environmental management has been included, which is to be supported.	residential development standards. The Code covers both the Considerate Constructors Scheme and mitigation of construction site impacts. The Council will encourage best practice during construction in all new development.
Wiltshire Wildlife Trust	38	7		We previously asked for the inclusion of the Considerate Constructor Scheme in the SPD as a recommendation. There is one reference to the use of considerate constructors, within the management section of the Code (but not a mandatory issue). There is, however, no specific mention of the Scheme, which would help guide developers into choosing accredited contractors.	The SPD uses the Code for Sustainable Homes as a basis for residential development standards. The Code covers both the Considerate Constructors Scheme and mitigation of construction site impacts. The Council will encourage best practice during construction in all new development
Wiltshire Wildlife Trust	38	8		There should be substantial reference to the Swindon Biodiversity Action Plan within the SPD, though it is only mentioned within Appendix 5. We would recommend inclusion	Reference to the Swindon Biodiversity Action Plan will be included in the supporting text.

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				of the following wording within the box 'Integrating biodiversity into buildings' (page 17).	
				"The built environment and its surrounds offer many opportunities to contribute fully to increasing the Borough's biodiversity and to achieve Swindon's biodiversity."	
WM Morrison Supermarkets PLC	59	1	pg23, para 2	The Council has not consulted with all sectors of industry to confirm whether BREEAM Excellent standard is achievable or realistic, and therefore we consider that this requirement should incorporate some flexibility to ensure that it does not represent an unreasonable burden on companies which could, in turn, jeopardise investment, regeneration and employment creation in the Council.	The Council has consulted on two revisions of the SPD providing ample opportunity for all sectors to comment on the SPD's contents. High standards of sustainable construction are both achievable and realistic. However, the Council recognises that there are occasions where a flexible approach to development standards would be appropriate. A flexible approach utilising aspirational standards is built into the SPD.
South Marston Parish	70	1	4.41 ,	The heading of this section refers to 'Maintaining the	It is unclear as to what this response refers to. However, it should be noted

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			identity and function of individual settlements'. This is a good requirement but the content only refers to the type of materials and style of buildings. It should also include factors that will enable the identity of a settlement as a separate community to be maintained.	that the guidance within the Sustainable Construction SPD will sit alongside the overarching policies of the core strategy in relation to maintaining and enhancing a sense of place throughout the Borough.
South Marston Parish	70	2	pg 7 part We are disappointed that the Swindon Standard will only adopt the CSH to level 3 and on-site energy sources will only supply 20% of a buildings energy requirements. This target seems to be low and not sufficiently stretching. It is thought that such a low target will not persuade developers to provide innovative low carbon local energy sources and we have some concerns as to how this deliverable can be measured.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council will seek to achieve high levels of sustainable construction in all development and will review the standards in the SPD in future revisions.
East Swindon Development	82	1	pg3 para The adoption of the SPD should be deferred	Swindon has high sustainability ambitions. The standards within the

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Group				pending the finalisation of the SWRSS and the completion of a local evidence base to underpin the SPD. In any event, provision is made for strategies specific to strategic development opportunities to be separately developed based on a robust site specific evidence base.	SPD are based on the recommendations of Swindon's Renewable Energy Task Group, local and national guidance and established sustainable construction standards. The SPD provides a basis for strategic development sites to maximize sustainable construction opportunities.
East Swindon Development Group	82	2	pg5	ESDG consider that the section of the SPD on purpose and status should refer to the expectation that specific guidance will be prepared separately for the EDA in due course, taking account of detailed feasibility and development work which would be undertaken in partnership with the Borough Council and wider stakeholders.	Given the scale of development at the Eastern It is not considered necessary to include a specific reference to the EDA at this point.
East Swindon Development Group	82	3	pg3 para2	It is proposed that there is recognition that flexibility will be needed in addressing blanket standards. Should be	The CSH/BREEAM standards within the SPD have now been made aspirational as a result of the Building a Greener Future policy statement. A "pre-assessment estimator" which will

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				couched as "seek to achieve" rather than "must meet". It is reasonable to place an obligation on developers to include a free standing sustainability statement giving consideration to achieving level three of the code.	predict the code/BREEAM standard of new development will be required alongside major planning applications.
East Swindon Development Group	82	4	pg7	<p>Pending further local work and national and regional guidance, the standard for onsite renewable energy should be reduced to 10%. Whatever on-site renewable energy target is set, this target must apply to the site as a whole and not to individual uses within the site.</p>	<p>The 20% low/zero carbon energy target is underpinned by the findings of Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.</p>
East Swindon Development Group	82	5	pg7	<p>Moreover the paper is specific that the Government's intent is not to require specific standards save through the considerable Building Regulation enhancements planned; ' It could be argued that developers should be required to go</p>	<p>The Swindon Standard builds on national guidance, including the Code for Sustainable Homes which provide a well known framework for developers to use in improving construction standards. It introduces challenging but realistic targets in relation to sustainable building design and construction.</p>

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				beyond regulations and achieve a particular level of the code - but if it was our intention to require higher standards than we have now then we would have put these in Building Regulations.	
East Swindon Development Group	82	5	pg7	It is considered imprudent to make a 50% Lifetime Homes proportion a requirement of the Swindon standard prior to the completion of a national consultation on the issue and to a programme that is wholly out of step with the proposed national timetable. It is suggested that the specific percentage target is prematurely included in the Swindon Standard.	The 50% target is not considered premature. It is considered vital that what we build today is robust and future proofed. It is assumed that the national consultation referred to is connected to making a CSH rating mandatory. The result of this was to make the lifetime homes standard a mandatory element of the CSH, thus supporting the target within the Swindon Standard.
East Swindon Development Group	82	6	pg7	Equally ESDG consider that it is reasonable to place an obligation on developers to include in a free standing Sustainability Statement, the consideration given to the	The SPD includes general standards which will provide the basis for any development to the east of Swindon. Given the scale of development at the Eastern Development Area (EDA), the Council would expect the highest possible standards of

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				achievement of level three of the Code.	sustainable building design and construction. It is not considered necessary to include a separate at this point.
East Swindon Development Group	82	7	pg7	The introduction of a blanket requirement to deliver 20% of developments energy requirements from onsite renewable energy sources is a concern in the absence of a commitment to prepare a site specific energy strategy for the EDA. It raises the expectations over and above the interim standard for 10% proposed in the draft Supplement to PPS1.	The 20% low/zero carbon energy target is underpinned by the findings of Swindon's Renewable Energy Task Group and supported by both national and regional guidance. The SPD includes general standards which will provide the basis for any development to the east of Swindon. It is not considered necessary to include a separate reference on the EDA at this point.
Hannick Homes & Developments Ltd	84	1		On procedural grounds, we object to the proposed policies being introduced as a SPD rather than a development plan document (DPD). The DCLG policy (23 July 07) states an expectation that LPA's introduce locally specific requirements as DPD's and not SPD's, so	In the light of the Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets

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			that the standards are subject to a robust legislative process prior to adoption.	
Hannick Homes & Developments Ltd	84	2	The SA and consequently SPD is deficient in that it fails to adequately assess the potential economic, social and environmental impacts of designing residential and non-residential buildings to meet the proposed building targets, including inadequate consideration of economic impacts (individual, local and regional impacts), the practicality of meeting proposed building and non-renewable energy targets within required time frames and the impacts on building appearance and residential amenity.	The Final SA acknowledges that, since the publication of recent DCLG guidance, initial SPD requirements are now aspirational because requirements cannot be introduced through an SPD. The Sustainability Appraisal has addressed in detail the possibility of requirements being onerous for the construction industry, with the possibility of some schemes becoming unviable as a result of increasing costs. It also addresses the problem of some relevant technologies not being available to meet requirements. The SA has also discussed the effect that certain sustainable materials can have on amenity and landscapes in the urban and rural area. A suggested transition period will allow the Council, development industry and other parties to adapt to the new requirements.
Hannick Homes &	84	3	Setting of a mandatory energy generation targets	The 20% zero/low carbon energy is related to regulated energy use and

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Developments Ltd				would both exceed DCLG 10% targets and does not give adequate strategic regard to the physical location and circumstances of sites (e.g. identify sites suitable for wind energy).	is therefore in line with the draft PPS1 Climate Change supplement. The issue of practicality in terms of site constraints is built into the SPD.
Hannick Homes & Developments Ltd	84	4		The SPD should be withdrawn, or failing that, the target standards withdrawn in preference to national guidance from the DCLG, including the program of step changes to Building Regulations and discretionary national no/low carbon energy targets of 10% unless modified by Development Plan Documents rather than SPD. Lifestyle Home standards and 'other' energy efficiency standards should be withdrawn from the SPD and remain discretionary elements and/or design targets to be assessed as part of a package of sustainable building measures under CSH.	In the light of the Government's Building A Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The Policy Statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.

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Hannick Homes & Developments Ltd	84	5		Introduction of the SPD in Swindon, in preference to relying on national policies and standards, would be in contradiction of national planning policy and perpetuate the trend of ad-hoc local standards. These inconsistencies between local authorities and regions distort the efficient operation of business and housing development markets, which increases the difficulty of building in Swindon in relation to other places. This will influence the decisions of business and housing companies towards developing land and locating elsewhere, while negating the potential of local energy saving to have a meaningful impact on climate change at a national and international scale.	In the light of the Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.
Hannick Homes & Developments	84	6		It is unreasonable to subject development to reassessment under the	The requirements of the SPD will apply to development without the benefit of planning permission and

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Ltd				SPD, when some projects may have already be subject to conditions of previous permissions, Including conditions addressing sustainability issues. In addition, the future development would be subject to the 'Building Regulations that are subject to review by DCLG in implementing 'Building a Greener Future' initiatives.	will therefore not act retrospectively. Swindon has high sustainability aspirations and will look to increase the standard of new development through appropriate mechanisms, including the planning system.
Persimmon & Redrow	85	1		On procedural grounds, we object to the proposed policies being introduced as a SPD rather than a development plan document (DPD). The DCLG policy (23 July 07) states an expectation that LPA's introduce locally specific requirements as DPD's and not SPD's, so that the standards are subject to a robust legislative process prior to adoption.	In the light of the Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is
Persimmon & Redrow	85	2		The SA and consequently SPD is deficient in that it	The standards within the SPD are considered challenging but realistic

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			fails to adequately assess the potential economic, social and environmental impacts of designing residential and non-residential buildings to meet the proposed building targets, including inadequate consideration of economic impacts (individual, local and regional impacts), the practicality of meeting proposed building and non-renewable energy targets within required time frames and the impacts on building appearance and residential amenity.	and are based on a sound evidence base. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Persimmon & Redrow	85	3	Setting of a mandatory energy generation targets of 20% would both exceed DCLG 10% targets and does not give adequate strategic regard to the physical location and circumstances of sites (e.g. identify sites suitable for wind energy).	The 20% zero/low carbon energy is related to regulated energy use and is therefore in line with the draft PPS1 Climate Change supplement. The issue of practicality in terms of site constraints is built into the SPD.
Persimmon &	85	4	The SPD should be	In the light of the Building a Greener

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Redrow				withdrawn, or failing that, the target standards withdrawn in preference to national guidance from the DCLG, including the program of step changes to Building Regulations and discretionary national no/low carbon energy targets of 10% unless modified by Development Plan Documents rather than SPD. Lifestyle Home standards and 'other' energy efficiency standards should be withdrawn from the SPD and remain discretionary elements and/or design targets to be assessed as part of a package of sustainable building measures under CSH.	Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.
Persimmon & Redrow	85	5		Introduction of the SPD in Swindon, in preference to relying on national policies and standards, would be in contradiction of national planning policy and perpetuate the trend of ad-hoc local standards.	In the light of the Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for

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			<p>These inconsistencies between local authorities and regions distort the efficient operation of business and housing development markets, which increases the difficulty of building in Swindon in relation to other places. This will influence the decisions of business and housing companies towards developing land and locating elsewhere, while negating the potential of local energy saving to have a meaningful impact on climate change at a national and international scale.</p>	<p>sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing. Adherence to national guideline such as the CSH provides a well known framework for developers to use in improving construction standards and moving toward making Swindon a more sustainable place to live and invest.</p>
Persimmon & Redrow	85	6	<p>It is unreasonable to subject development to reassessment under the SPD, when some projects may have already be subject to conditions of previous permissions, including conditions addressing sustainability issues. In addition, the future development would</p>	<p>The requirements of the SPD will apply to development without the benefit of planning permission and will therefore not act retrospectively.</p>

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			be subject to the 'Building Regulations that are subject to review by DCLG in implementing 'Building a Greener Future' initiatives.	
Home Builders Federation	95	1	The HBF consider that the Sustainable Design and Construction SPD is unnecessary. This local planning document in many cases simply repeats national planning guidance as set out in the Code for Sustainable Homes.	The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.
Home Builders Federation	95	2	We are concerned that the accelerated implementation timescale is unhelpful and will not be conducive to achieving the Governments target outlined above.	The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.
Home Builders Federation	95	3	In terms of the preparation of a sustainability statement requirement, the HBF would question whether this would add any value to the national Sustainable Code Initiative. The HBF consider that such an approach would	The final draft SPD specifies what needs to be submitted with a planning application. In addition to a simple Pre-Assessment Estimator in connection with sustainable construction, the remaining requirements can be integrated into the design and access statement already required.

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			be an onerous and time-consuming requirement for developers to undertake and would not be consistent with the Barker recommendation to reduce the information requirements to support planning applications.	
Home Builders Federation	95	4	The HBF is fundamentally opposed to such a requirement (Open Book), which goes way beyond the remit of Town and Country Planning legislation and is, in effect an attempt to set a level of developer profit by imposing a land tax on development, which will believe it to be illegal.	The open book approach is used in a variety of other planning situations where viability is an issue. As the Swindon Standard is now not entirely mandatory, an open book approach is only like to be used in cases where it is unviable to achieve the 20% zero/low carbon energy standard.
Home Builders Federation	95	5	The SPD should not include a specific requirement for Lifetime Housing. There are a number of means of providing access and flexibility without specifically requiring lifetime homes. The SPD should reflect this without detailing the need	The Lifetime Homes standard is included within the Code for Sustainable Homes and the Government is minded to make this a mandatory element of the Code. The SPD therefore includes an aspirational target of 50% of new dwellings on major sites to reach the lifetime home standard. The Council welcomes additional means of

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				for 'Lifetime Homes'.	providing access and flexibility.
Home Builders Federation	95	6		The HBF objects to the requirement on major development for 20% of the building's energy to be provided on site. It may not be suitable for all sites to provide on site renewable energy due to the site's location, geology, topography and potential lack of natural resources.	The issue of practicality in terms of site constraints is built into the SPD.
David Wilson Homes (Southern)	97	1	pg7	DWH objects to the 'requirement' to reach the Swindon Standard particularly in its current form. DCLG consultation on 'the Future of the Code for Sustainable Homes' does not require codes to be met but will ensure a rating is given to new homes. It also suggests a transitional period until changes in the building regulations 2010.	The CSH requirement within the Swindon Standard is not aspirational. The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.
David Wilson Homes (Southern)	97	2	pg7	Level 3 of the CSH will be implemented by changes to Building Control Regulations in 2010. DWH	Level 3 of the code for sustainable is achievable now. Publicly funded housing must achieve level 3 and a major housebuilder has already

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			believes that it is doubtful whether either developers or homeowners applying for planning permission would be practically able to reach this standard at this time.	committed to making all its new homes level 3 from January 2007.	
David Wilson Homes (Southern)	97	3	pg7	On Page 7, of the Draft SPD, the Building Act 1984, Building Regulations, is referred to. It would be helpful if the document also referred to the more recent revisions to the building regulations, April 2006, which have achieved a 40% improvement in energy efficiency of new houses compared with pre-2002 standards.	The Building Act 1984 sets the context for Building Regulations and any revisions made to Building Regulations.
David Wilson Homes (Southern)	97	4	pg7	DWH objects to the requirement that at least 20% of the energy requirements of buildings in major development must be derived from on-site renewable energy and/or an efficient supply of heating, cooling and power. This exceeds the	The 20% zero/low carbon energy is related to regulated energy use and is therefore in line with the draft PPS1 Climate Change supplement and also the findings of the Swindon Renewable Energy Task Group and the draft Regional Spatial Strategy.

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				provisions set out in national guidance.	
David Wilson Homes (Southern)	97	5	pg7	DWH believes that the Borough Council should establish an 'Energy Trust' to enable the energy efficiency of existing (Pre 2000) stock which has much lower energy efficiency standards. Contributions could be made where on-site renewable energy is neither practicable nor efficient. This is likely to have a far greater Impact on reducing energy requirements.	Comments noted.
David Wilson Homes (Southern)	97	6	pg7	Objections to the 50% target for Lifetime Homes Standard (LHS). Swindon does not have a particularly aged population which forms the justification for LHS at national level. Government Consultations on the future of the Code for Sustainable Homes suggests including LHS in	The Lifetime Homes standard is included within the Code for Sustainable Homes and the Government is minded to make this a mandatory element of the Code. The SPD therefore includes an aspirational target of 50% of new dwellings on major sites to reach the lifetime home standard. The Council welcomes additional means of providing access and flexibility.

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				the CSH but without regulatory intervention. Between 2008 and 2010 a 6 star rating in the CSH with LHS being part of the 3 star rating by April 2013. LHS is not a regulatory requirement of development.	
The New Swindon Company	104	1		The SPD repeats the demands made by the Code for Sustainable Housing and the BREEAM standards. It is not clear what benefit is gained by incorporating this into the Swindon Standard, particularly as the Government is seeking to make the CSH mandatory.	The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.
The New Swindon Company	104	2		It is not clear how those elements of the Swindon Standard that relate back to CSH and BREEAM can be assessed by officers and members of the Council, particularly in respect or determining planning applications.	The final draft SPD specifies what needs to be submitted with a planning application. In addition to a simple Pre-Assessment Estimator, undertaken by a certified assessor in connection with sustainable construction, the remaining requirements can be integrated into the design and access statement already required.
The New	104	3		It is yet to be decided	Swindon has high sustainability

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Swindon Company				whether the code is best implemented through the planning or the building regulations system. It may be more appropriate to incorporate any Swindon Standard through the latter route, rather than through the planning system.	aspirations and will look to increase the standard of new development through appropriate mechanisms, including the planning system.
The New Swindon Company	104	4		In respect of the many of the measures, it is unclear how officers would assess the improvements over the building regulations, whether failure to meet this constitutes a reason for refusal and how a reason like this might stand up at appeal.	The final draft of the SPD specifies what needs to be submitted with a planning application. In addition to a simple Pre-Assessment Estimator in connection with sustainable construction, the remaining requirements can be integrated into the design and access statement already required. The sustainable construction elements which relate to local/national policy will be assessed accordingly.
The New Swindon Company	104	5		The relationship between the Code Assessor and the planning process is unclear, and the means of assessing the additional elements that make up the Swindon Standard are unclear.	The final draft of the SPD specifies what needs to be submitted with a planning application and the process involved.
Asset Projects	118	1	pg7, para	Swindon aim is to lead the	The thresholds used are in

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Ltd			4-5	UK on adopting sustainable building processes yet the 'Scale' set in these areas are going to exclude significant volumes of properties from adhering to these proposals. There should be an analysis of the last 2 years construction which will show in actual quantity, and the number of applications that will fall below and above the two threshold of homes (10-off) and non residential (1,000sm). More non residential has been built over the last 2 years that is below 1000sm. By showing data for the above and below then an informed decision can be made as to the setting of these thresholds.	accordance with planning legislation and are a nationally recognised standard. The scope of the guidance will be reviewed in the future.
Asset Projects Ltd	118	2	pg 25-31	The whole of section 4 deals with 'Major residential and non residential developments' yet there are many technologies mentioned in this section	Initially the revised SPD will only apply to major developments. This requirement captures the majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those

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			that would be applicable to smaller developments. The danger is that as these are seen to be 'recommended' for 'major' developments then say, the Planning Dept, may be able to reject them if brought forward by a developer for a smaller scale development.	larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.	
Asset Projects Ltd	118	3	pg11-18	The lowering of both BREEAM and Code For Sustainable Homes Standard in this latest Draft SPD has not been supported by data to sustain those reductions. With the high thresholds for homes and non-residential, the reducing of standards will have an impact on Swindon's overall C)2 achievement levels. There should be evidence to demonstrate the potential impact of the lowering of both standards and a review made of that evidence to ensure that if	The sustainable construction standards have not been lowered since the previous draft. The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.

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				adopted the impact is acceptable in the terms of meeting Swindon's overall aim of becoming a leader in sustainability construction.	
Ms Deborah Joffe	154	1		Objecting in particular to the substitution of the former BREEAM excellent standard with level 3 of the CSH. Level 3 is entirely inadequate to meet the demands of global warming. A much higher level, particularly of energy efficiency, is attainable with current technology - people are building near carbon zero homes in the UK so there is no technical reason why this cannot be done for every new building.	The Code for Sustainable Homes (CSH) /BREEAM standards within the SPD have now been made aspirational as a result of the Government's 'Building A Greener Future' policy statement. A "pre-assessment estimator" which will predict the CSH/BREEAM standard of new development will be required alongside major planning applications.
Ms Deborah Joffe	154	2		All issues such as cost and political acceptability must be subsidiary to the demands of climate change.	Swindon has high sustainability ambitions and these are reflected in the aspirational targets within the SPD. The Council recognises that are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to

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Ms Deborah Joffe	154	3	All new buildings and refurbishments must be at level 5 or 6 of the CSH.	meet the high standards of construction in line with the Council's ambitions. The standards the SPD are considered challenging but realistic and are based on a sound evidence base. The Council will seek to achieve high levels of sustainable construction in all developments and will review the standards in the SPD in future revisions.
Taylor Woodrow Developments Ltd	161	1	On procedural grounds, we object to the proposed policies being introduced as a SPD rather than a development plan document (DPD). The DCLG policy (23 July 07) states an expectation that LPA's introduce locally specific requirements as DPD's and not SPD's, so that the standards are subject to a robust legislative process prior to adoption.	In the light of the Government's Building A Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.
Taylor Woodrow Developments	161	2	The SA and consequently SPD is deficient in that it fails to adequately assess	The standards within the SPD are considered challenging but realistic and are based on a sound evidence

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Ltd				the potential economic, social and environmental impacts of designing residential and non-residential buildings to meet the proposed building targets, including inadequate consideration of economic impacts (individual, local and regional impacts), the practicality of meeting proposed building and non-renewable energy targets within required time frames and the impacts on building appearance and residential amenity.	base. The Council will seek to achieve high levels of sustainable construction in all developments and will review the standards in the SPD in future revisions.
Taylor Woodrow Developments Ltd	161	3		Setting of a mandatory energy generation targets would both exceed DCLG 10% targets and does not give adequate strategic regard to the physical location and circumstances of sites (e.g. identify sites suitable for wind energy).	The 20% zero/low energy requirement is related to regulated energy use and is therefore in line with the draft PPS1 Climate Change supplement. The issue of practicality in terms of site constraints is built into the SPD.
Taylor Woodrow Developments	161	4		The SPD should be withdrawn, or failing that, the target standards	The 20% zero/low carbon energy requirement is related to regulated energy use and is therefore in line

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Ltd				withdrawn in preference to national guidance from the DCLG, including the program of step changes to Building Regulations and discretionary national no/low carbon energy targets of 10% unless modified by Development Plan Documents rather than SPD. Lifestyle Home standards and 'other' energy efficiency standards should be withdrawn from the SPD and remain discretionary elements and/or design targets to be assessed as part of a package of sustainable building measures under CSH.	with the draft PPS1 Climate Change supplement. The Lifetimes Homes standard is included within the Code for Sustainable Homes and the Government is minded to make this mandatory element of the Code. The SPD therefore includes an aspirational target of 50% of new dwellings on major sites to reach the lifetime home standard.
Taylor Woodrow Developments Ltd	161	5		Introduction of the SPD in Swindon, in preference to relying on national policies and standards, would be in contradiction of national planning policy and perpetuate the trend of ad-hoc local standards. These inconsistencies between local authorities	The Code for Sustainable Homes (CSH)/BREEAM standards within the SPD have now been made aspirational as a result of the Government's 'Building a Greener Future' policy statement.

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			and regions distort the efficient operation of business and housing development markets, which increases the difficulty of building in Swindon in relation to other places. This will influence the decisions of business and housing companies towards developing land and locating elsewhere, while negating the potential of local energy saving to have a meaningful impact on climate change at a national and international scale.	
Taylor Woodrow Developments Ltd	161	6	It is unreasonable to subject development to reassessment under the SPD, when some projects may have already be subject to conditions of previous permissions, Including conditions addressing sustainability issues. In addition, the future development would be subject to the 'Building Regulations that are	The SPD would not be applied to sites which have the benefit of an extant planning permission. The SPD has been revised as a result of the Government's 'Building a Greener Future' policy statement.

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				subject to review by DCLG in implementing 'Building a Greener Future' initiatives.	
Countrywide Homes Ltd	164	1		It is clear that there is a disparity between the SPD and the supplement to PPS1 with regard to the level of development at which the on-site or zero carbon. It is reiterated that alternative figures should be tested through a development plan document not a supplementary planning document.	The 20% zero/low carbon energy requirement is related to regulated energy use and is therefore in line with the draft PPS1 Climate Change supplement. The issue of practicality in terms of site constraints is built into the SPD.
Countrywide Homes Ltd	164	2		Having regard to the requirements of the supplement to PPS1 and to PPS12 it is clear that the Swindon SPD fails to accord with the requirements of those documents.	The standards within the SPD have been amended to reflect the Government's Building A Greener Future policy statement.
Countrywide Homes Ltd	164	3		The SPD is not in conformity with PPS1 or its supplement guide - Planning and Climate Change.	The standards within the SPD have been amended to reflect the Government's Building A Greener Future policy statement.

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	<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	4		The SPD proposes significant requirements on developers which are considerably above those proposed within Planning and Climate Change.	The standards within the SPD have been amended to reflect the Government's Building A Greener Future policy statement.
Countrywide Homes Ltd	164	5		The SPD proposes a policy position which should be tested through an independent examination of a Development Plan Document.	In the light of the Government's Building A Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.
Countrywide Homes Ltd	164	6		The SPD proposes a policy position which is not sufficiently linked to an adopted Local Plan / DPD Policy.	The final draft of the SPD identifies where the SPD links to local/national policy. The sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets.
Countrywide Homes Ltd	164	7		The SPD is not a DPD and should therefore not be used by Swindon Borough Council as a short cut to impose excessively	In light of the Government's Building A Greener Future policy statement , the sustainability requirements introduced within the Swindon Standard which are not referenced in

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			restrictive controls upon development within the borough.	local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which Swindon Borough Council is currently pursuing.
Countrywide Homes Ltd	164	8	The council must take account of the views of the development industry with regard to the impact and cost of imposing such stringent sustainable building requirements. The Council should be seeking incremental change, not wholesale change.	Swindon has high sustainability ambitions and these are reflected in the targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Countrywide Homes Ltd	164	9	It is considered that the SPD should be in conformity with the supplement to PPS1, therefore a higher threshold should be included or the text should be amended to refer to 'substantial development' rather than major development as defined by the GDPO.	Swindon has high sustainability ambitions and these are reflected in the targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions

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	<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	10		It is considered more appropriate to prepare for a 'step change' in process, for example seeking sustainable development in accordance with the Code Level 3 rather than imposing burdens which are more stringent than the level 3 requirements (i.e. the Swindon Standard). If more stringent measures are considered to be necessary for Swindon they should be introduced on a time delayed basis.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council will seek to achieve high levels of sustainable construction in all developments and will review the standards in the SPD in future revisions.
Swindon Climate Action Network	166	1	pg8, paragraph 5	Feel strongly that if compliance with the standards renders the development impractical or unviable then the development should not go ahead unless there are legal reasons. The clause should not be used as a tool for developers to push through projects and avoiding the requirements of the SPD.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Swindon	166	2	pg11,	There should be no	The threshold set captures the

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	<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Climate Action Network			paragraph 1	minimum size threshold. If the building can't be built to the highest standards, it should not be built at all.	majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.
Swindon Climate Action Network	166	3	pg11, paragraph 1	Given the current climate crisis, level 3 of the Code for Sustainable Homes is not sufficient, new homes should be built to level 5 immediately. If Swindon is serious about being the most sustainable borough in the country, we should be mandating level 6 now - we would be the first borough to do so.	The Code for Sustainable Homes standard within the SPD have now been made aspirational as a result of the Government's Building A Greener Future policy statement. The standards within the SPD are considered challenging but are realistic and are based on a sound evidence base. The Council will seek to achieve high levels of sustainable construction in all developments and will review the standards in the SPD in future revisions.
Swindon Climate Action Network	166	4	Pg 25	The previous draft of this SPD stated the minimum figure was set to rise by 1% year-on-year, but now there seems to be no clause specifying an annual increase. If this SPD is adopted in its current form, the requirement would stay at	The 20% low/zero carbon energy target is in line with government guidance. An opportunity to include incremental increases is provided through the work on the Local Development Framework which is currently being pursued.

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	<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
				20% indefinitely unless explicitly changed by a future change of policy. We would like the previous commitment for an annual increase in the renewable energy provision to be reinstated, with increases of 20% per annum.	
Swindon Climate Action Network	166	5	pg25,	The section on schools says that all new schools must meet the BREEAM Excellent standard, but that refurbishments over a given size or cost only need to meet the 'very good' standard. The Excellent standard should be specified for refurbishments as well as new build.	It would be difficult to impose a rigid approach due to the varying quality of existing schools in terms of design and the ability to meet the "excellent" standard. The Council will do its utmost to achieve the highest standards in the design of new schools, and extensions and refurbishments to new schools.
Swindon Climate Action Network	166	6	pg 34, paragraph 4	Evolution of the CSH from level 3 to level 6. The SPD has no firm commitment to evolve upwards from level 3. The SPD uses weasel words such as 'it is envisaged that the standard will evolve..' and 'Future standards are likely	In the light of the Government's Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be

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<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
			to..'. The document should include a firm commitment to evolve. The current rate of evolution (level 6 by 2016) is simply that proposed for the region as a whole in the SW Spatial Strategy. The Swindon Standard must evolve faster than the region for a whole, if Swindon is to stand out and reach its goal of being a leader in sustainability.	introduced through the DPD process which the Council is currently pursuing. The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.
Swindon Climate Action Network	166	7	There is still a question mark over enforcement and accountability. How will compliance with the standards be enforced? Who will enforce them? What is to prevent developers from submitting a planning applications for something that meets all the standards perfectly and then just building whatever they want? And what will happen if the final product neither matches the planning application nor meets the standards?	The implementation of the SPD will involve cross working with Building Control in terms of both assessing the Swindon Standard and monitoring its effects. There will be an early review of the implementation process to ascertain whether amendments to the process are required.

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		<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	1	pg8, Para 5	Feel strongly that if compliance with the standards renders the development impractical or unviable then the development should'nt go ahead unless there are legal reasons. The clause should not be used as a tool for developers to push through projects and avoiding the requirements of the SPD.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council recognises that are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Andy	Parsons	167	2	pg11, Para 1	There should be no minimum size threshold. If the building can't be built to the highest standards, it should not be built at all.	The threshold set captures the majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.
Andy	Parsons	167	3	pg11, para1	The previous draft of this SPD stated the minimum figure was set to rise by 1% year-on-year, but now there seems to be no clause specifying an annual increase. If this SPD is adopted in its current form, the	The 20% low/zero carbon energy target is in line with government guidance. An opportunity to include incremental increases is provided through the work on the Local Development Framework which is currently being pursued.

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			requirement would stay at 20% indefinitely unless explicitly changed by a future change of policy. We would like the previous commitment for an annual increase in the renewable energy provision to be reinstated, with increases of 20% per annum.			
Andy	Parsons	167	4	pg8, Para 5	The current draft still contains a clause whereby if the developer feels that compliance with the required standards would make the development impractical or unviable then they 'will need to enter into early discussions with the Council'.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council recognises that are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Andy	Parsons	167	5	pg11, Para 1	The CSH Standards only apply to developments over a certain size.	The threshold set captures the majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.
Andy	Parsons	167	6	pg 25	The section on schools	It would be difficult to impose a rigid

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				says that all new schools must meet the BREEAM Excellent standard, but that refurbishments over a given size or cost only need to meet the 'very good' standard. The Excellent standard should be specified for refurbishments as well as new build.	approach due to the varying quality of existing schools in terms of design and the ability to meet the "excellent" standard. The Council will do its utmost to achieve the highest standards in the design of new schools, and extensions and refurbishments to new schools.
Andy Parsons	167	7	pg34, Para 4	Evolution of the CSH from level 3 to level 6. The SPD has no firm commitment to evolve upwards from level 3. The SPD uses weasel words such as 'it is envisaged that the standard will evolve..' and 'Future standards are likely to..'. The document should include a firm commitment to evolve. The current rate of evolution (level 6 by 2016) is simply that proposed for the region as a whole in the SW Spatial Strategy. The Swindon Standard must evolve faster than the region for a whole, if Swindon is to	In the light of the Government's Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the DPD process which the Council is currently pursuing. The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.

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		<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	8		stand out and reach its goal of being a leader in sustainability. There is still a question mark over enforcement and accountability. How will compliance with the standards be enforced? Who will enforce them? What is to prevent developers from submitting planning applications for something that meets all the standards perfectly and then just building whatever they want? And what will happen if the final product neither matches the planning application nor meets the standards?	The implementation of the SPD will involve cross working with Building Control in terms of both assessing the Swindon Standard and monitoring its effects. There will be an early review of the implementation process to ascertain whether amendments to the process are required.
Simon	Bridewell	171	1	pg3, Para 3	Whilst I support the increase in the renewable energy requirement from 15% to 20%, this is still not enough. It should start at 50%. I notice also that the annual 1% increase for this requirement has been dropped from the SPD.	The 20% low/zero carbon energy target is underpinned by the findings of the Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.
Simon	Bridewell	171	2	pg7, Para	The requirement for	The standards within the SPD are

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		<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
			4		residential developments has changed from BREEAM 'Excellent' standard to CSH level 3. The Swindon Standard should include the highest standards available if the council is committed to making Swindon the UK's most sustainable place as per the executive summary.	considered challenging but realistic and are based on a sound evidence base. The Council will seek to achieve high levels of sustainable construction in all developments and will review the standards in the SPD in future revisions.
Simon	Bridewell	171	3	pg24, Para 1	The SPD states that school refurbishment projects should only meet the BREEAM 'very good' standard rather than the 'excellent' standard. It should be at 'excellent' standard.	It would be difficult to impose a rigid approach due to the varying quality of existing schools in terms of design and the ability to meet the "excellent" standard. The Council will do its utmost to achieve the highest standards in the design of new schools, and extensions and refurbishments to new schools.
Simon	Bridewell	171	4	pg7, Para 1	The current requirement is for only major developments to meet the Swindon Standard. This Standard should be applied to all developments regardless of scale. This should remove the exemption for smaller developments to meet the	The application to major development focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.

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Simon	Bridewell	171	5	pg8, Para 5	The SPD still contains a loophole whereby developers can avoid having to meet the Swindon Standard if they consider it would make the development impractical or unviable. Having a third party validate the claim of impracticality or unviability is enough. If a development cannot meet the Swindon Standard then it should not go ahead.	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Anish	Harrison	177	1	pg10, para8	The previous version of this SPD contained the provision that all developments (subject to a minimum size Threshold) were to meet the BREEAM Excellent Standard. Although this still applies to non-residential developments, residential developments now have to meet the new CSH level 3 standard with level 5 to be attained by 2011, and finally level 6 by 2016. Given the current climate	The Code for Sustainable Homes/BREEAM standards within the SPD have now been made aspirational as a result of the Government's Building A Greener Future policy statement. The policy statement provides scope for sustainability standards to be introduced through the Development Plan Document process which Swindon Borough Council is currently pursuing.

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Anish Harrison	177	2	pg10, Para 2	<p>crisis, level 3 is not sufficient, new homes should be built to level 5 immediately. If Swindon is serious about being the most sustainable borough in the country, we should be mandating level 6 now? We would be the first borough to do so.</p> <p>I support the decision to increase the requirement for renewable energy provision to new developments from 15% to 20%. However, given the latest scientific predictions on climate change, that this figure is not ambitious enough. This SPD should insist on a minimum of at least 50% renewable energy provision. The rapid recent developments in the fields of micro-generation and other green technologies make this figure immediately.</p>	<p>The 20% low/zero carbon energy target is underpinned by the findings of the Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.</p>
Anish Harrison	177	3	pg10, Para 2	<p>The previous draft of this SPD stated the minimum</p> <p>The 20% low/zero carbon energy target is in line with government</p>	

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			figure was set to rise by 1% a year-on-year, but now there seems to be no clause specifying an annual increase. If this SPD is adopted in its current form, the requirement would stay at 20% indefinitely unless explicitly changed by a future change of policy. I would like the previous commitment for an annual increase in the renewable energy provision to be reinstated, with increases of 10% per annum.	guidance. An opportunity to include incremental increases is provided through the work on the Local Development Framework which is currently being pursued.
Anish Harrison	177	4	pg25, Para 3 The section on schools says that all new schools must meet the BREEAM Excellent Standard, but that refurbishments over a given size or cost only need to meet the 'very good' standard. The Excellent standard should be specified for refurbishments as well as new build.	It would be difficult to impose a rigid approach due to the varying quality of existing schools in terms of design and the ability to meet the "excellent" standard. The Council will do its utmost to achieve the highest standards in the design of new schools, and extensions and refurbishments to new schools.
Anish Harrison	177	5	pg11, The BREEAM / CSH	The threshold set captures the

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<i>Ref No:</i>	<i>Obj.No.</i>	<i>Para</i>	<i>Objection summary</i>	<i>Response</i>
		Para 1	standards only apply to developments over a certain size. There should be no minimum size threshold. If the building can't be built to the highest standards, it should not be built at all.	majority of new development (in housing terms, this equates to around 89% of new dwellings) and focuses on those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the future.
Anish Harrison	177	5	pg8, Para 5 The current draft still contains a clause whereby if the developer feels that compliance with the required standards would make the development impractical or unviable then they 'will need to enter into early discussions with the Council'. The possible outcomes of these negotiations are not listed. I feel strongly that if compliance with the standards renders the development impractical or unviable then the development shouldn't go ahead unless there are legal reasons (e.g.; listed buildings).	The standards within the SPD are considered challenging but realistic and are based on a sound evidence base. The Council recognises that are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Adam Vickers	178	1	pg34,	The transition period is far The Code for Sustainable

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				Para 6.2	too long. The technology already exists to meet code 5 now. The proposal as it stands suggests that code 6 will not be met until 2016 which is far too long given urgent need to start mitigating climate change right now. Code 6 should be mandatory from 2010-11.	Homes/BREEAM standards within the SPD have now been made aspirational as a result of the Government's Building A Greener Future policy statement. The policy statement provides scope for sustainability standards to be introduced through the Development Plan Document process which Swindon Borough Council is currently pursuing.
Adam	Vickers	178	2	page 7	The 20% low or carbon neutral energy requirement is too low given the urgent climate change issues that we face. The target should be increased to 30% for 2008 with 40% by 2012 and 50% by 2014.	The 20% low/zero carbon energy target is underpinned by the findings of the Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.
Gina	Adams	179	1	pg3, Para 1	The revised SPD requires level 3 of the CSH, but this is a lower environmental standard than the ecohomes 'excellent' standard in the previous draft, and instead of being the top level of available standards is now the middle level. The CSH has	In the light of the Government's Building a Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the Development

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			increased environmental standards over Ecohomes, because it recognises that we are facing a major climate change and that technologies to achieve this are available. New builds to be Level 6, move forwards, instead of backwards.	Plan Document process which Swindon Borough Council is currently pursuing. The standards within the SPD are considered challenging but realistic and are based on a sound evidence base.
Gina Adams	179	2	pg25, Para 1 While I support the from 15% to 20% renewable energy provision, this does not go far enough. If Swindon's, build makes the most of passive solar gain and new technologies including micro-generation and CHP, the % energy sources from low or zero carbon could be much higher.	The 20% low/zero carbon energy target is underpinned by the findings of Swindon's Renewable Energy Task Group and supported by both national and regional guidance. Future revisions of the SPD will update this where appropriate.
Gina Adams	179	3	pg25 What has happened to the requirement for % for energy to be supplied by low or zero carbon sources? This was a significant strength of the previous draft, recognising the fact that there will be a	The 20% low/zero carbon energy target is in line with government guidance. An opportunity to include incremental increases is provided through the work on the Local Development Framework which is currently being pursued.

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			rapid increases in technology and cost-effectiveness of delivering renewable energy, and building codes should take more advantage of these developments every year.	
Gina Adams	179	4	pg23, Para 2 Application of the ecohomes excellent standard should not be restricted to non-residential developments over 100m/sq. They should apply to all developments. The climate does not care where the carbon comes from, and the cumulative effects of multiple small developments would significantly undermine the effectiveness of the SPD. There is no justification for this loophole.	The threshold set focus on the those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in due course.
Gina Adams	179	5	pg11, Para 1 The CSH standards should not be restricted to a major residential development or more. They should apply to all developments. The climate	The threshold set focus on the those larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in due course.

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			does not care where the carbon comes from. The cumulative effect of multiple small developments would significantly undermine the effectiveness of the SPD. There is no justification for this loophole.	
Gina Adams	179	6	pg8, Para 5 There should be no exemptions to applying the Swindon Standard. If the building cannot be ecologically responsible, it should not be built. Simple as that. Remove the exception clause.	Swindon has high sustainability ambitions and these are reflected in the targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Gina Adams	179	7	There is no mention of how the Swindon Standard will be enforced. Across the country, developers are failing to meet existing environmental and energy efficiency with buildings, and shamefully, to date, none have been taken to court by a local authority.	The implementation of the SPD will involve cross working with Building Control in terms of both assessing the Swindon Standard and monitoring its effects. There will be an early review of the implementation process to ascertain whether amendments to the process are required.

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			Strict enforcement of this SPD will be required if it is to be effective, and this must be included in the SPD, with clear accountability at senior level within SBC.		
Gina Adams	179	8	pg 34, Para 3 There is no commitment to increasing the CSH standard, and so the phased implementation plans are very weak. Woolly words such as '..it is envisaged that the Swindon Standard will evolve' and 'Future standards are likely to follow...'. Furthermore, this is possibly future evolution is no higher than that already planned for the region in the SW Regional Spatial Strategy.	The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction.	
	CPRE - Wroughton and Chiseldon	243	1	There is no direct reference in the draft, to the design of hot water supply systems. I have experience of two 1930's semi-detached houses. In one, the water heater is in the kitchen and the hot	Comment noted.

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			<p>water storage cylinder is in the bathroom, almost immediately above it. This involves very short pipe runs and an almost instant supply of hot water at the bathroom and kitchen taps. In the other house, the hot water cylinder is at the far side, it take up to 2 bowls of cold water before the warm reaches the tap. This happens a number of times in the course of the a day, involving considerable waste of heat in the pipes and a substantial waste of water.</p>	
RPS Group	247	1	<p>The CSH has been introduced to enable a phased approach to reducing carbon emissions from new housing developments. This phased approach would allow, particularly smaller developers, time to adapt to the new requirements. Many of these smaller developers have not been involved with EcoHomes</p>	<p>Swindon has high sustainability ambitions and these are reflected in targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.</p>

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			and therefore compliance with the code will involve significant changes to their business.	
RPS Group	247	2	Requiring Code level 3 and 20% on site renewable generation will equate to something like a Code level 5. This could put many smaller developers under so much pressure that they will find it impossible to continue their business. The Swindon needs to combine its 3 elements of sustainability (environment, economics and social responsibility).	The Swindon Standard builds on national guidance and introduces challenging but realistic targets in relation to sustainable design and construction. Level 3 of the Code of Sustainable Homes is achievable now, publicly funded housing must already achieve Level 3.
RPS Group	247	3	Introducing the need for 20% renewables this would give the developer the opportunity and indeed good reason to continue to build dwellings with poor u-values, high air leakage and poor thermal bridging and incorporate the 20% renewable obligation. This is because the improvement to the	The SPD adopts a hierarchal approach with energy efficiency design the first consideration. In respect of on-site energy provision, the practicality in terms of site constraints is built into the SPD.

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			u-values etc so vital to the higher levels of the Code cost money and developers will not wish to pay twice.			
RPS Group	247	4	'Building a Greener Future' paragraph 3.47 published on 23rd July 2007. This states in relation to any 'Local Approach' using the CSH that 'we will therefore expect the local approach to be set out in a development plan document, not a supplementary guidance document, so as to allow full scrutiny including by a independent inspector'. From this statement it would appear that Swindon Borough Council could be in breach of government recommendations.	In the light of the Government's Building A Greener Future policy statement, the sustainability requirements introduced within the Swindon Standard which are not referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the Development Plan Document process which Swindon Borough Council is currently pursuing.		
Ms A	Coppock	320	1	pg11, Para 1	The previous version of this SPD contained the provision that all developments (subject to a minimum size Threshold)	In the light of the Government's Building A Greener Future policy statement, the sustainability requirements introduced with the Swindon Standard which are not

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			<p>were to meet the BREEAM Excellent standard. Although this still applies to non-residential developments, residential developments now have to meet the new CSH level 3 standard with level 5 to be attained by 2011, and finally level 6 by 2016.</p> <p>Given the current climate crisis, level 3 is too low, new build should be at level 5 immediately.</p>	<p>referenced in local/national policy will be aspirational targets. The policy statement provides scope for sustainability standards to be introduced through the Development Plan Document process which Swindon Borough Council is currently pursuing.</p>	
North Wiltshire District	321	1	whole doc	I give up. I wanted to comment on various parts of an SPD and nothing is actually what I would consider an objection. It was constructive criticism. Your on-line form is too inflexible.	Comment noted.
North Wiltshire District	321	2		The SPD should demonstrate that the 20% requirement for on-site renewable energy generation on developments of 10 households or more would	In respect of on-site energy provision the issue of practicality in terms of site constraints is built into the SPD.

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			not normally unrealistically raise construction costs. This must be done for it to be defensible that the onus is placed on developers to enter into discussions early with an 'open book' approach to demonstrate why they cannot viably comply.	
North Wiltshire District	321	3	The document makes mention of 'major' developments and 'larger' developments. One of these only is included in the glossary and the terms have not been used rigorously throughout.	Comment noted.
North Wiltshire District	321	4	The section on solar passive design is worrying in relation to climate change. There are many sources that are now discouraging the simplistic approach of larger windows to the south because of significantly increased overheating risks. It would be better if this rather generic design guidance is	Comment noted.

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			omitted and replace simply with references to very recent national design guidance such as the Energy Savings Trust publication 'Reducing Overheating; A Designers Guide, CE129, 2006.	
North Wiltshire District	321	5	The case studies only include 2 from the Swindon area. Although one has 40% of electricity needs from an enormous array of expensive photovoltaics, it is not clear what percentage of the buildings energy requirements were achieved and whether it meets the 20% minimum as being set. The other example does not appear to fully achieve any of the minimum targets being set in the new SPD.	Comment noted.
Lay Holdings Ltd	322	1	Scale -10 dwellings at current density levels is too small a development to afford compliance except in the insulation standards (Part L building regulations	The threshold set focuses on those larger developers best able to comply with the guidance. Swindon has high sustainability ambitions and these are reflected inn the targets within the SPD. The Council recognises that

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				are already dealing with this) and some aspects of energy efficient design. On the other hand, one large dwelling is more likely to be able to offer and afford more energy efficient benefits.	there occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
Lay Holdings Ltd	322	2		On site zero emission generation is space demanding and has very low energy generation abilities. Wind power, solar and heat pumps all have considerable limitations, are very expensive to install and produce very low rates of return. Seeking 20% ON-SITE generation will make projects unviable due to capital costs, the amount of energy generation should be unspecified but be realistically appraised project by project.	The 20% zero/low carbon energy requirement is related to regulated energy use and is therefore in line the draft PPS1 Climate Change supplement. The issue of practicality in terms of site constraints is built into the SPD.
Lay Holdings Ltd	322	3		Non-residential development - As set out above the same problems exist and whilst insulation	The issue of practicality in terms of site constraints is built into the SPD.

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				standards can be achieved, other factors will vary project by project and on-site energy generation will be very difficult.	
Swindon Exchange Team	323	1	pg7 table	The requirement for achieving BREEAM 'Excellent' for non-residential proposals appears to be unnecessarily stringent in comparison to the residential requirements, especially with the additional 'Swindon Standard' requirement for 20% renewables. We believe this policy will be particularly difficult to achieve successfully on large mixed-use schemes.	Swindon has high sustainability ambitions and these are reflected in the targets within the SPD. The Council recognises that there are occasions where a flexible approach to development standards would be appropriate. However, the Council will proactively encourage developers to meet the high standards of construction in line with the Council's ambitions.
RPS	324	1		Code 3 will be very difficult for many to achieve in the short term. Whilst the industry fully is committed to the overall concept great care needs to be taken to ensure that early introduction of over ambitious mandatory	Level 3 of the Code for Sustainable Homes is achievable now. Publicly funded housing must achieve Level 3 and a major housebuilder has already committed to making all of its new homes Level 3.

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			standards does not further suppress house building. The development plan preparation process is the best way of ensuring that the matter is dealt with appropriately.	