

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

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Okus Area Residents Association	156	10	4.18 (SA)	This is exactly what will happen on the SDA development. Why is it being ignored?	The Sustainability Appraisal highlights potential risks. Many of the sustainability issues highlighted will be addressed in the SPD.
Okus Area Residents Association	156	11	5.36 (SA)	The wording re target figure of 15% should be "must be", not "could be".	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Persimmon & Redrow	85	3	pg 1	The implication with this guidance being operative on approval by Committee is that it then applies to all planning applications submitted. This is unacceptable where outline permissions have already been granted, or indeed where there is an adopted Development Brief for a	The requirements of the SPD will initially apply to future major developments. SPD's cannot be applied retrospectively. However, the Council will seek to encourage sustainable design and construction on all development sites.

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Taylor Woodrow Developments Ltd	161	10	pg 1	Firmly believe that implementation of the guidance note is premature pending more technical evidence and justification. Would not support adoption in its current form.	The revised draft SPD has been amended to accord with emerging national guidance. The Borough Council notes that cost assessment studies have been undertaken for English Partnerships/Housing Corporation (EP/HC), and the Environment Agency, which have identified what is technically achievable now. EP/HC also require Code 3 on their sites. The Borough Council has adopted a flexible timescale to the implementation of the SPD. It is envisaged that the "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation to put in place systems to maximise the impact of the guidance.
Home Builders Federation	95	1	pg 1	The HBF consider that the SPD is unnecessary, in many cases it simply repeats national planning guidance as set out in the Code for Sustainable Homes	The SPD has been revised to accord with emerging national planning guidance, and now incorporates the Code for Sustainable Homes within the standard required for residential development, and the BREEAM standard for non-residential development, as a basis for a "Swindon Standard".

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Home Builders Federation	95	3	pg 1	It is important that changes to standards or requirements in construction need to be made with detailed consideration so that the cost of achieving the requirement does not outweigh the benefit obtained by the change.	The revised draft SPD has been amended to accord with emerging national guidance. The Borough Council notes that cost assessment studies have been undertaken for English Partnerships/Housing Corporation (EP/HC), and the Environment Agency, which have identified what is technically achievable now. EP/HC also require Code 3 on their sites. The Borough Council has adopted a flexible timescale to the implementation of the SPD. It is envisaged that the "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation to put in place systems to maximise the impact of the guidance.
The New Swindon Company	104	8	pg 1	The document should ensure that it is aligned with the emerging sustainability advice contained within the RSS. The document should also cross reference the Code for Sustainable Homes, produced in a final form by the Government in December 2006, which covers similar ground to	Agreed, the SPD has been revised to accord with the Code for Sustainable Homes and the draft Regional Spatial Strategy.

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Home Builders Federation	95	2	pg 1	Sustainable construction policies are best implemented at the national level through either Building Regulations or the Code for Sustainable Homes to ensure policies are consistent, comparable	The draft SPD has been revised to accord with emerging national planning guidance, including the Code for Sustainable Homes. The Council notes that the Code is currently voluntary for private sector development. However, there is no reason why this should not be used as a basis for a "Swindon Standard" as it is now Government endorsed national guidance. The Borough Council recognises that it is still early days and some flexibility has been incorporated into the revised SPD where a developer can demonstrate that meeting the required scheme would make a development unviable/impractical.
David Wilson Homes (Southern)	97	4	pg 1	Given the publication of various government guidance and the report on zero carbon development making recommendations for the RSS, then it would be wise to reconsider the scope and requirements of the draft SPD.	The draft SPD has been revised to accord with emerging national and regional planning guidance, including the Code for Sustainable Homes.

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David Wilson Homes (Southern)	97	2	pg 1	Concerned over the standards the draft SPD sets, compared with those being set out at the national level through Government guidance. The SPD is framed as a set of requirements, without which planning permission will not be obtained. By contrast, the national Code of Sustainable Homes is voluntary.	The draft SPD has been revised to accord with emerging national planning guidance, including the Code for Sustainable Homes. The Council notes that the Code is currently voluntary for private sector development. However, there is no reason why this should not be used as a basis for a "Swindon Standard" as it is now Government endorsed national guidance. The Borough Council recognises that it is still early days and some flexibility has been incorporated into the revised SPD where a developer can demonstrate unviability/impracticality.
The Theatres Trust	94	1	pg 1	Disappointed that arts and cultural facilities have not been included in the document.	The initial focus of the SPD is on the requirements on major residential/non-key residential development. However, Swindon Borough Council will encourage sustainable design and construction in all future development. Arts and cultural facilities is included in the

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Home Builders Federation	95	4	pg 1	The development industry has signed up to the Government's target of zero carbon development by 2016. In order to achieve this the industry should be able to rely on a clear national framework. However the SPD does not appear to be following the national framework as set out in the Code for Sustainable Homes and Building Greener Future.	The SPD has been revised to accord with emerging national planning guidance, and now incorporates the Code for Sustainable Homes within the standard required for residential development, and BREEAM standard for non-residential development, as a basis for a "Swindon Standard". The revised SPD incorporates an implementation plan which details how the SPD will be implemented in the short term and what requirements will be expected in the future. Following on from a short transition period the Borough Council are proposing a phased approach to implementation in-line with that proposed on the draft Regional Spatial Strategy.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	15	pg 10	The imposition of renewable energy targets must take account of the availability of national and regional power generation, the availability and cost of technologies for district or site based energy and the specific suitability of the site to accommodate such facilities. It has to be understood that much of the technology is still in development in terms of practical performance criteria, reliability etc, and the availability of an established market for supply, installation and servicing.	The Borough Council recognise that the availability of technology is evolving, and this has been taken on board with the proposal for a short transition period to allow the Council, the development industry and other external organisations involved to put in place systems to maximise the impact of the guidance. The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Borough Council wishes to work constructively with the development industry.
Persimmon & Redrow	85	7	pg 10	The ability to achieve all buildings with 30 degree south is totally dependent on the site size, shape constraints and other requirements placed upon it. It is therefore suggested that this should be an objective rather than a requirement.	The revised draft of the SPD identifies this as an objective to be considered in the design process. However, the Borough Council recognises that it may not be achievable on every single building

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	Okus Area Residents Association	156	2	pg 10	Raising of the base level by only 1% per year from 2007 is woefully inadequate. Surely it would be sensible and reasonable to insist on a 50% minimum base line by the end of our next Local Plan to 2026 i.e. 2% yearly	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The UK Renewables target
Simon	Bridewell	171	8	pg 10	The section only seems to cover energy use during the occupancy of the buildings, not the energy use involved in construction, it should	Energy use involved in construction is now implicitly considered through the Code for Sustainable Homes and the BREEAM standard, for example in the sections on materials.
	Persimmon & Redrow	85	6	pg 10	There needs to be some clarity and explanation as to how the 15% figure is assessed, for example, is it based on running costs or what?	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial

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RIBA Wiltshire Branch	168	14	pg 10	<p>The policy of imposing a percentage of renewable energy on a new development does not appear to derive from the material and arguments presented in the document.</p> <p>The important targets for the Council must concern the reduction of carbon emissions and this can be most effectively achieved by energy efficiency, passive solar design, district, mini or micro generation, specification of sustainable materials from local sources to minimise embodied energy and planning high density mixed-use development and effective public transport.</p>	<p>The SPD introduces the "Swindon Standard", which includes a 20% zero/low carbon energy requirement (regulated emissions), and standards based on the Code for Sustainable Homes/BREEAM standard. Carbon dioxide reduction will be implicit in this "Swindon Standard".</p>
RIBA Wiltshire Branch	168	1	pg 10	<p>Swindon Borough Council should ensure that the SPD does not repeat Government guidance/regulations, and puts in place policies and examples which will encourage these to be exceeded. The policies need to be closely targeted to achieve the best value.</p>	<p>The draft Climate Change supplement to PPS1 (Dec 2006) highlights in Para 30 that "Planning Authorities should be concerned with the environmental performance of new development." For new homes, the supplement also encourages standards to be based on the Code for Sustainable Homes. A framework for introducing sustainable design requirements through planning is therefore in place.</p> <p>The "Swindon Standard" incorporates targeted requirements to maximise impact of the guidance.</p>

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RIBA Wiltshire Branch	168	16	pg 10	Without policies to address the energy consumption of all existing buildings, a 15% target for new housing is every blunt instrument and it would be preferable to identify specific energy-use targets for new developments of all categories, which can also then be transferred to the existing building stock. Failure to address the energy consumption of the existing stock, the policies of the draft SPD will lose credibility.	The issue of energy consumption of existing buildings could only be covered through this SPD where planning permission is required for redevelopment. The Borough Council are adopting a phased approach, with the SPD applying initially to 'major' development only. The SPD has been revised to adopt a holistic approach based on recognised Government endorsed standards.
The New Swindon Company	104	4	pg 10	The 15% renewable energy requirement is a considerable new requirement from a base position of virtually zero. The document needs to be clear in setting out how it expects a developer to do this, and what are the consequences of this is not met. It is not clear how the figure has been arrived at. It is not clear how the Council might seek to measure this at planning application stage and once the development is built.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The Council has adopted a flexible timescale to the implementation of the SPD. The Swindon Standard will be required of new major development from 1st January 2008. This will allow the Borough Council, the development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the

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Anish	Harrison	177	2	pg 10	The hard realities of climate change require considerably tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.	A carbon dioxide emissions reduction is implicit within the Code for Sustainable Homes/BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon dioxide emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard", and to meet Level 5 & 6 of the Code for Sustainable Homes. Future revisions of this guidance will consider setting an overall carbon reduction target.
	Kier Property Developments	163	1	pg 10	The on-site renewable energy requirements is premature. The draft Climate Change supplement to PPS1 states that prior to the inclusion of policy within an adopted DPD, a standard of 10% should be required. The SPD should justify the 15% requirement, in the event that this is not possible then the requirement should be 10% .	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Strategy. PPS1 sets a minimum

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Adrian	Read	170	4	pg 10	The need is to aim for zero carbon energy provision in new build homes in a reasonable time frame. Although the targets set in are probably quite radical, the time to achieve 100% zero-carbon energy is much too long. Would like to see an initial target at 25% with a 5% year on year increase to reach 100% by about 2022.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. This target along with the requirements of the Code for Sustainable Homes and the BREEAM standard for non residential development, which have been incorporated in to the SPD, sets a schedule to achieve carbon neutral development by 2016.
	Home Builders Federation	95	7	pg 10	Object to the 15% renewable energy requirement. It may not be suitable for all sites to provide on site renewable energy supply due to the site's location, geology etc. In some cases it may be better to contribute to a large scale renewable energy scheme that would provide more energy to a greater number and would also require less maintenance. It should also be considered on a site by site basis rather than implementing a blanket policy as one size does not fit all.	The revised draft SPD now includes a zero carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's renewable Energy Task Group and the draft South West Regional Spatial Strategy. The guidance encourages consideration of district type heating schemes in larger development. The revised SPD allows some flexibility where an applicant can demonstrate that meeting the required standards is unviable.

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SBC Renewable Energy Task Group	186	5	pg 10	Major new developments must demonstrate that a decentralised energy supply systems appraisal has been undertaken.	The Code for Sustainable Homes encourages local energy provision, credit is awarded where energy is supplied from local renewable or low carbon energy sources. Decentralised energy supply systems will be encouraged.
SBC Renewable Energy Task Group	186	4	pg 10	Recognise that through renewable energy provision sector is still developing, and therefore, whilst 40% renewable energy is technically achievable, it would be difficult to achieve on in high volume development. Therefore suggest a requirement for a minimum of 20% on-site now, with a commitment to review this on an annual basis.	Agreed, the revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The Borough Council will review the SPD on an annual basis.
Hannick Homes & Developments Ltd	84	3	pg 10	There is no justification for the 15% renewable energy requirement. Suggest this is amended to read: "in addition major development will be encouraged on a voluntary basis to incorporate on	The revised draft SPD now includes a zero carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's renewable Energy Task Group and the draft South West Regional Spatial Strategy.

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East Swindon Development Group	82	8	pg 10	Object to the incremental increases in on-site renewable energy requirements. While the draft supplement to PPS1 proposes an incremental approach to achieving higher standards of environmental performance over time, the stipulation of an annual increment of 1% has not been justified.	The incremental increases have been removed from the revised draft SPD. The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and	
Simon Bridewell	171	7	pg 10	The focus of the section should be on reducing energy use by built-in efficiency. For example all new homes should be fully insulated with double or triple glazing.	This is implicit in the Code for Sustainable Homes and the BREEAM standard, which have been incorporated in to the revised SPD as part of a wider "Swindon Standard".	
East Swindon Development Group	82	6	pg 10	The 15% on-site renewable energy requirement does not accord with the draft supplement to PPS1, which refers to 10%.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The figure included in the draft supplement to PPS1 sets a	

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WM Morrison Supermarkets PLC	59	2	pg 10	The renewable energy requirement is potentially onerous and conflicts with the intentions of PPS22. It notes that the requirement to generate on-site renewable energy is only applied to developments where the installation is viable given the type of development proposed, its location, and design; and secondly should not be framed in such a way as to place an undue burden on developers.	The draft Climate Change supplement to PPS1 (Dec 2006) highlights in Para 30 that "Planning Authorities should be concerned with the environmental performance of new development." A framework for introducing sustainable design requirements through planning is therefore in place. However the Borough Council acknowledge that implementing more sustainable methods of design and construction, including the provision of renewable energy, is reliant on technical availability and knowledge. The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry.

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East Swindon Development Group	82	7	pg 10	Object to the omission of reference to considerations of feasibility and practicality in the last sentence on page 10, as well as to energy conservation measures that can reduce the need for energy generation. Propose the following amendment: "Where it is not feasible, practical or financially viable to meet this target, a commuted sum for offsite remediation may be acceptable. However, account will be taken of the energy conservation measures proposed to reduce the need for energy generation, in determining the need for any such commuted sum."	The SPD has been revised and no longer makes reference to the payment of a commuted sum. The SPD now includes an element flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Borough Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry.
Taylor Woodrow Developments Ltd	161	4	pg 10	There is no justification for the 15% renewable energy requirement. Suggest this is amended to read: "in addition major development will be encouraged on a voluntary basis to incorporate on	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial

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Persimmon & Redrow	85	5	pg 10	The on-site renewable energy requirement is onerous and without foundation or confirmation that this is achievable. It would be better to allow a settling in period of a couple of years.	The revised draft SPD now includes a zero/low energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The Council has adopted a flexible timescale to the implementation of the SPD. The "Swindon Standard" will be required of new major development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the impact of the guidance.
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	9	pg 10	The renewable energy requirement should apply to all new development. Further there should be a requirement to meet the best available sustainability standards available at the time the properties are built, not at the time planning consent is	The revised draft SPD will initially only apply to 'major' development for implementation reasons. The Borough Council cannot enforce a higher standard than that agreed at the granting of planning permission. However the Council can negotiate, particularly where there has been a change in national guidance.

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Hartwell Plc	162	3	pg 10	That paragraph 2.1 is amended to state: "In addition, major development must incorporate on-site renewable energy and/or an efficient supply of heat, cooling and power, to supply up to 10% of the building's energy requirements. Such a requirement will only be sought where it does not render the development unviable.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task group and the draft South West Regional Spatial Strategy. The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Borough Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development

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Alex	Lockton	183	2	pg 10	There are important factors to be considered when choosing renewable energy. Without seeing plans we can only be non-specific and say that solar thermal, heat pumps and PV are the simplest to apply to most domestic properties on a small scale. Wind turbines are not very effective in urban environments, and roof mounted ones sound good but can damage buildings. CHP is still in its infancy in domestic situations. District heating and power systems are a good way forward in dense developments.	Agreed, issues raised are relevant and will be key considerations in new major development. Expert advice is required in the design of schemes.
	Hartwell Plc	162	2	pg 10	Also object to the rise in the base target level by 1% per year. On the basis that this is unrealistic and unachievable and is likely to make most developments unviable.	The incremental rises to the base target level have been removed from the revised draft SPD. The SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's renewable Energy Task Group and the draft South West Regional Spatial Strategy

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Swindon Climate Action Network	166	18	pg 10	Energy inefficient fixtures and fittings should be prohibited, all light fittings should be fitted with low energy lighting.	Energy efficiency is now implicitly considered through the Code for Sustainable Homes/BREEAM standard, which have been incorporated into the revised SPD.
McCarthy and Stone	145	2	pg 10	The energy conservation requirements are ambitious and unrealistic. There is a substantial difference in the energy conservation targets put forward in Government Guidance and that of the SPD. This approach is unsound and unjust and would like to see an alteration to bring the targets in line with Government Guidance.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The draft PPS on Climate Change (Para 1.13) acknowledges that many local authorities want to move quickly to ensure new development delivers higher environmental standards, and that local circumstances may justify such higher standards.
Swindon Climate Action Network	166	8	pg 10	Would like the SPD to emphasise the importance of built-in energy efficiency as a priority to the use of renewable energy.	This is now implicit in the revised SPD which promotes an holistic approach. The Code for Sustainable Homes, which forms the basis for the residential standard of the SPD, requires (Level 3) a 25% improvement rate dwelling emission rate above current Building Regs. The SPD also promotes solar passive

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	Swindon Climate Action Network	166	12	pg 10	Energy efficiency standards should be extended to existing buildings that are seeking planning permission for renovations or extensions or are put up for sale. Up to 84% of Swindon's housing stock may have been built before 1976. The SPD should require that developers or homeowners carry out a Home Energy audit and introduction of energy efficiency measures as a requirement of obtaining planning permission.	The Borough Council have adopted a phased approach to the implementation of the SPD, initially the SPD will apply only to 'major' development. 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
Ms Deborah	Joffe	154	4	pg 10	Would like to emphasise the importance of built-in energy efficiency as prior to the generation of renewable energy, although both are essential environmentally and	This is now implicit in the revised SPD which promotes an holistic approach. The Code for Sustainable Homes, which forms the basis for the residential standard of the SPD, requires (Level 3) a 25% improvement rate dwelling emission rate above current Building Regs. The SPD also promotes solar passive
	Swindon Climate Action Network	166	9	pg 10	The whole lifecycle of a building should be taken in to account when measuring energy efficiency. With primary and mandatory measures taken to maximise energy efficiency built into the fabric and layout.	This is implicit in the Code for Sustainable Homes and the BREEAM standard which have both been incorporated in to the revised draft of the SPD as part of a wider "Swindon Standard".

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Swindon Climate Action Network	166	7	pg 10	The renewable energy requirement is too low, and has been effectively superseded by the Government's announcement that all new homes are to be carbon neutral by 2016. Would like to see Swindon attain this goal before 2016, in order to achieve this more ambitious targets must be adopted, with a 50% target for energy from renewable sources, rising by 12.5% per year. This would put Swindon on track to have carbon neutral homes four years after implementation of the SPD. Believe these are attainable given the pace of technological improvements, economies of scale and growing public support.	The revised draft of the SPD now includes a zero/low energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The SPD sets out a schedule to achieve carbon neutrality	
Helen Parker-Drabbl	173	3	pg 10	In the light of the need to be ambitious and to show leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20 - 25% in the first year, with annual increases at a rate which will lead to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy.	

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Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	8	pg 10	The 15% renewable energy requirement is too low if new homes are to be carbon neutral by 2016, more ambitious targets are required. Would like to see a target of 40% of energy from renewable sources, rising by 10% per year. This would put the Borough on track to have carbon neutral new homes six years after the implementation of the SPD.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The SPD sets a schedule to achieve carbon neutrality by 2016.
Persimmon & Redrow	85	8	pg 10	The ability to introduce and use effectively alternative renewable energy sources is entirely dependent on the willingness of the LPA to accept such proposals as part of developments. The planning system as it operates at the present time is far too inflexible in this regard.	The government through various publications has indicated a positive approach to the provision of on-site renewable energy. The Borough Council are also committed to the provision of renewable energy in new development. The Renewable Energy Task Group report has recommended that the Council should require a minimum of 20% on-site sustainable energy generation in all major new development, to meet the UK target of generating 20% energy from renewable energy sources by 2020.

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David Wilson Homes (Southern)	97	8	pg 10	Object to the 15% renewable energy requirement, as this exceeds the provisions set out in the draft supplement to PPS1. Footnote 21 to the Climate Change supplement to PPS1 notes that prior to adoption of a Development Plan Document a standard of 10% should be required.	The revised draft SPD now includes a zero carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. PPS1 sets a minimum requirement.	
Ms Deborah	Joffe	154	5	pg 10	The whole lifecycle of a building should be taken into account when measuring energy efficiency, with primary and mandatory measures taken to maximise energy efficiency built into the fabric of the buildings.	Guidance on the lifecycle of a building is implicit in the Code for Sustainable Homes/BREEAM standard which have been incorporated into the revised SPD.
David Wilson Homes (Southern)	97	9	pg 10	Object to the requirement to provide on-site renewable energy on residential developments of over 10 dwellings. This represents a departure from regional and national policy, and is likely to be unfeasible due to the lack of available and affordable technology. Add reference to higher thresholds as set out in research commissioned by the Regional Assembly.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The draft RSS has benefited from research by Faber Maunsell/Peter Capener which sets out the basis for the thresholds proposed in the RSS. The proposed thresholds in the revised SPD are similar to those in the RSS.	

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
CPRE - North Wilts and Swindon		16	2	pg 10	Would seek much higher target levels than those outlined in the document. Without these it will not be possible to seek a renewable energy target of 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Ms Deborah Joffe		154	6	pg 10	In the light of the need to be ambitious and for SBC to show true leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20-25% in the first year, with annual increases at a rate which will lead to 100% by 2030. This should be feasible with large-scale new-build developments, technology developments, economies of scale and growing public support.	The revised draft SPD now include a zero/low carbon energy requirement of 20% (regulated emissions) for major development I Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Andy Parsons		167	8	pg 10	The whole lifecycle of a building should be taken in to account when measuring energy efficiency. With primary and mandatory measures taken to maximise energy efficiency built into the fabric and layout.	This is implicit in the Code for Sustainable Homes and the BREEAM standard which have both been incorporated in to the revised draft of the SPD as part of a wider "Swindon Standard".

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	7	pg 10	The renewable energy requirement is too low, and has been effectively superseded by the Government's announcement that all new homes are to be carbon neutral by 2016. Would like to see Swindon attain this goal before 2016, in order to achieve this more ambitious targets must be adopted, with a 50% target for energy from renewable sources, rising by 12.5% per year. This would put Swindon on track to have carbon neutral homes four years after implementation of the SPD. Believe these are attainable given the pace of technological improvements, economies of scale and growing public support.	The revised draft of the SPD now includes a zero/low energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The SPD sets out a schedule to achieve carbon neutrality
	Okus Area Residents Association	156	1	pg 10	A definition of 'major developments' will be necessary.	A definition was provided in the Executive Summary (pg2) and in the Energy section (pg10) of the first draft of the SPD and has been incorporated in to the revised draft.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	18	pg 10	The renewable energy target is much too timid and, with the amount of new development planned for Swindon, and would result in a rapidly rising total carbon footprint. This is simply not sustainable. The SPD should propose an initial target of 25% rising to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. This target along with the requirements of the Code for Sustainable Homes and the BREEAM standard for non residential development, which have been incorporated in to the SPD, sets a schedule to achieve carbon neutral development by 2016.	
Gina Adams	179	7	pg 10	The goals and targets should all relate directly and measurably to concrete reductions in carbon emissions. The problem with a target of 15% renewable energy supply is that this sets no real or measurable targets for reducing carbon emissions. At the heart of the SPD should be an overall requirement for reducing carbon emissions throughout the lifecycle of the development. The reduction target should increase by a percentage, every year, just as proposed for the renewable target.	A reduction of carbon emissions is implicit within the Code for Sustainable Homes/BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future Revisions of this guidance will consider setting an overall carbon	

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hartwell Plc	162	1	pg 10	The 15% target for on-site renewable energy is too high, unrealistic and is at odds with guidance contained in the draft RSS. Consider that a figure of 10% is more realistic and reasonable and would be consistent with the regional plan and Government targets.	The revised draft SPD now includes a zero carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy.
The New Swindon Company	104	6	pg 11	Requests for effective and efficient design and layout in terms of sustainable design and construction may lead to design solutions that are not 'traditional' in appearance and character. Provided that non-traditional designs are accommodated alongside traditional routes, where a balance of appearance and sustainability is required, the guidance could be successful.	This issue has been highlighted in the Sustainability Appraisal. Any planning application would be considered in the context of all relevant policies in the adopted Local Plan, including those on design, and any other relevant adopted guidance.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina Adams		179	16	pg 11	<p>Would like to see many of the solutions described as options under the Sustainable Solutions, as requirements, each with concrete targets. In particular use of the following should be required: Use of passive solar gain Natural ventilation and heat</p> <p>Insulation Most energy efficient appliances Thermostatic valves to radiators Room Sensors</p>	All of the solutions mentioned are identified within the revised SPD, either as part of the Code for Sustainable Homes/BREEAM standard, for example energy efficiency, or are included within the wider "Swindon Standard" for example passive solar gain and natural ventilation.
	Home Builders Federation	95	8	pg 11	The SPD should not attempt to influence the internal layouts of developments, as it is not considered a planning	The revised SPD adopts an holistic approach to design which will naturally influence internal layout.
	Taylor Woodrow Developments Ltd	161	5	pg 12	The guidance note does not recognise that, as a general rule, it will not be possible to achieve orientation of all buildings within "30 degrees of south", unless the intention is to provide developments of parallel terraced rows.	The revised draft of the SPD identifies this as an objective to be considered in the design process. However, the Borough Council recognises that it may not be achievable on every single building

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Hannick Homes & Developments Ltd	84	7	pg 12	The guidance note does not recognise that, as a general rule, it will not be possible to achieve orientation of all buildings within "30 degrees of	The revised draft of the SPD identifies this as an objective to be considered in the design process. However, the Borough Council recognises that it may not be achievable on every single building
	Wiltshire Wildlife Trust	38	3	pg 12	The fourth bullet point should read: "Rooms used less often, or those that would not benefit from sunlight."	Agreed, the SPD has been amended accordingly.
Adrian	Read	170	6	pg 13	Energy efficiency is the most effective way of reducing the carbon footprint of developments. For example, all lighting needs to be specified to be low energy. Recessed halogen lighting is inefficient and limits the amount of insulation in the ceiling void. Ideally light fittings should be specified that do not allow the use of tungsten or halogen bulbs.	Energy efficiency is implicit in both the Code for Sustainable Homes and the BREEAM standard, both of which have been incorporated in to the revised SPD.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Home Builders Federation	95	9	pg 13	It is considered that the requirement for the installation of energy efficient appliances is inappropriate. The Local Planning Authority should not impose policy on a matter, which is ultimately down to the consumer. The developer has no influence as to whether it is used, substituted or sold	The installation of energy efficient appliances forms part of the requirements in the Code for Sustainable Homes/BREEAM standard which have been incorporated in to the revised SPD. This promotes good practice.
Wiltshire Wildlife Trust	38	4	pg 13	Insulation should use environmentally friendly materials. (see materials chapter). Alternatives to UPVC should be sought, such as using FSC certified wood.	The use of appropriate materials is implicit in the Code for Sustainable Homes/BREEAM standard, which have been incorporated in to the revised SPD.

				<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust		38	5	pg 13			Third bullet point should read: "In larger buildings a Building Energy Management System (BEMS) can be useful as part of an Environmental Management System (EMS)." There should be more emphasis on encouraging developers and applicants to continue the environmental commitment they have made during construction into the operation and running of their businesses, through an EMS.	Agreed, the SPD has been amended accordingly. Energy management is implicit in the Code for Sustainable Homes and BREEAM standard, which have both been incorporated as a base standard in the revised SPD.
Ms Deborah	Joffe	154	10	pg 13			Seem to make excellent sense to mandate double/triple glazing on all windows for energy efficiency purposes.	Both the Code for Sustainable Homes and BREEAM which have been incorporated into the revised SPD require increased energy efficiency standards. This can be achieved in a number of ways and double/triple glazing can play an important role.
Gina	Adams	179	15	pg 13			Refers to domestic property using the most energy efficient appliances within the required price range. What does this mean in practical terms, it seems like an enormous	The wording has been strengthened in the revised draft by aligning to the guidance in the Code for Sustainable Homes.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Ms Joffe Deborah		154	11	pg 13	Prohibit energy inefficiencies, e.g. recessed halogen lighting which limits insulation.	Energy efficiency is implicit in the Code for Sustainable Homes and BREEAM standard, and with other requirements identified in the "Swindon Standard" forms a holistic approach to sustainable building design and construction.
	Swindon Civic Trust	108	11	pg 14	Need to research the most sustainable policies of other local authorities to determine what is the current state of the art and is this document sufficiently advanced to achieve its leadership role? This work should be included in the appendix.	Research has been undertaken, including making contact with other local authorities and with relevant government agencies. The Borough Council do not consider that it is necessary to outline this in an appendix to the SPD.
	Swindon Civic Trust	108	12	pg 14	The SPD should define the expertise it requires for the implementation and monitoring of these	The Borough Council are proposing a short transition period to provide the opportunity for the Council to refine its internal processes, in consultation with the development industry and other relevant organisations. The revised SPD incorporates an implementation plan which details how the SPD will be implemented in the short term and what requirements will be expected in the future.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	13	pg 14	Where a householder is in a position where they are solely dependent on one ESCO for some or all of their energy requirements, they can become hostage to non-competitive pricing. The SPD needs to address this issue by stating how safeguards can be put in place to avoid this	This issue is a valid consideration but falls outside the scope of the SPD. Further research is required on this matter, subsequent reviews of the SPD may allow for more specific guidance to be included.
South Marston Parish	70	4	pg 14	Concerned that visual impact is the only potential impact identified, including no reference to noise. Noise pollution is covered in pg 4, but not satisfactorily. Suggest that the wording of E3 (3rd Para) be modified to read: "..careful siting and design can minimize potential visual, noise and other impact"	Agreed, the SPD has been amended accordingly. This issue is also highlighted in the Sustainability Appraisal.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	10	pg 14	At present there are split responsibilities, and plenty of scope for legal challenge on the more onerous aspects, with a number of parties involved. The SPD should outline best practice policy on how the Borough will manage and implement good working co-operation between the various parties to ensure that the required outcomes are achieved in practice.	The Borough Council recognises that implementing more sustainable methods of design and construction is also reliant on advice, expertise and availability of components from a range of organisations. The Borough Council therefore proposes a short transition period to allow the Council, the development industry and other external organisations involved to put in place systems to maximise the impact of the guidance.
Swindon Civic Trust	108	9	pg 14	Object to the section on "Delivering and Managing Sustainable Energy Solutions" because this is perhaps the most important part of the document and needs to be expanded to cover all issues involved, the method of managing these issues needs to be sustainable, clear and robust.	Additional guidance is indicated in the Further Information sections. The scope of the guidance will be reviewed in the future.
Wiltshire Wildlife Trust	38	6	pg 14	In the first paragraph, the end of the sentence should read: " and from a sustainable source."	This issue is covered in the materials sections of the Code for Sustainable Homes/BREEAM standard, which have been incorporated in to the revised SPD.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina	Adams	179	19	pg 15	In general do not understand why there are not more linkages between the different stages. Things that are referred to in one stage but do not appear in other stages, it suggests a lack of 'joined-up-ness'.	The SPD has been revised with a more simplified structure which provides a more user-friendly document which clearly sets out the "Swindon Standard" and what is required to meet it. The "Swindon Standard" uses as its basis the Code for Sustainable Homes for residential development and the BREEAM standard for non-residential development.
	Swindon Climate Action Network	166	15	pg 15	The SPD should make specific and enforceable requirements rather than providing advice and asking for consideration to be given. The summaries should state: "Development proposals must address the following issues".	The requirements have been strengthened in the revised SPD.
Gina	Adams	179	18	pg 15	The use of the term 'Correctly' in the detailed design section should be defined in energy efficiency terms. Reference to energy use minimisation should also refer to heat.	Energy efficiency is implicit within the revised SPD. Detailed guidance on energy efficiency requirements is provided within the Code for Sustainable Homes and the BREEAM standard.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina Adams		179	17	pg 15	Would like to see this strengthened with more concrete requirements, e.g. change 'enhance the potential for energy conservation' to 'conserve energy'.	The SPD has been strengthened by the incorporation of the Code for Sustainable Homes and the BREEAM standard. Energy conservation is implicit in both the Code and the BREEAM standard.
	Wroughton Parish Council	51	2	pg 15	Has pressure testing of each building design, been included to ensure that the U-Value is maintained, to eliminate leakage through poorly fitted external doors, windows, and from the roof into wall cavity's.	This issue is implicit in the Code for Sustainable Homes and BREEAM standard which have been incorporated in to the revised SPD.
	Wiltshire Wildlife Trust	38	8	pg 18	W1 should also include a statement: "On site composting should be included in all developments, where appropriate." This reduces the amount of landfill, leading to cost savings and benefits to the environment.	This issue is implicit in the Code for Sustainable Homes/BREEAM standard which have been incorporated into the revised SPD.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	9	pg 18	The SPD provides no justification of proposing a figure of 15%, it appears to be an arbitrary amount that is neither substantiated nor based in policy. The supplement to PPS1 is permissive of increased figures, but only on the basis that the amount is substantiated and based on a special local approach set out in a DPD. The SPD is not a DPD, therefore it is inappropriate to propose figures above those identified in the PPS1 supplement.	A revised 20% zero/low carbon energy requirement is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The Borough Council considers that the SPD is in line with the overall thrust of the draft supplement to PPS1 and in particular with the guidance on provision of on-site sustainable energy.
Countrywide Homes Ltd	164	7	pg 18	The definition of major development in the SPD is not in accordance with the draft supplement to PPS1, which defines 'substantial new development' with a floor area over 1,000sq.m or similar when defined through a development plan document.	The footnote on pages 2 and 10 of the first draft of the SPD provided a definition, in line with that in the current General Permitted Development Order (GDO), and have been included within the revised draft of the SPD. The supplement to PPS1 is only a draft, therefore it is reasonable to use the existing definition in the GDO.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	2	pg 18	Appropriate facilities and space for separation and storage, composting etc. can be designed into new developments to facilitate recycling without significant difficulty and cost, however the existing housing stock will always be less able to respond. To meet the required targets, the major initiatives and investments need to be within the Borough Council's infrastructure and services together with active control of the source of most recyclable waste through retailers.	The issues raised are valid considerations but fall outside the scope of this SPD.
Thames Water Property Services	17	1	pg 18	There needs to be an acceptance that as growth increases so does the production of waste water/sewage and subsequently more sewage sludge is produced at sewage treatment works (STW) which requires treatment/disposal.	Agreed.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Persimmon & Redrow	85	9	pg 18	<p>Whilst it is not a problem form a construction point of view to provide facilities for on-site recycling either communally or individually, it does require co-operation on behalf of the Council in terms of recycling collections. Unless new developments are going to have recycling facilities for all waste products, either doorstep or locally communal as part of the overall development, then it is inappropriate to expect developers to have to provide storage facilities for all recycling.</p>	<p>Following adoption of the Borough Council's new Municipal Waste Strategy, the Council are in the process of introducing a weekly kerbside recycling collection, alongside a fortnightly collection of non-recyclable waste (using wheelie bins) for residential properties within the Borough. In line with the Code for Sustainable Homes the revised draft SPD requires that provision is made for recycling/waste storage in new residential development.</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	8	pg 18	The draft supplement to PPS1 states that a figure of 10% on-site renewable energy should be sought until an alternative figure has been identified within an adopted DPD. It is highly inappropriate for Swindon Borough Council to seek a 15% requirement, it is excessive and does not allow for step change in process.	The revised draft SPD now includes a zero carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at relatively early stage and the and the Council wishes to work constructively with the development industry.
Hannick Homes & Developments Ltd	84	4	pg 19	In principle accept that sufficient storage space should be provided. However question the ability of the Borough Council to collect on a regular basis. Until such times as a reliable collection service is available W2 cannot be	Following adoption of the Borough Council's new Municipal Waste Strategy, the Council are in the process of introducing a weekly kerbside recycling collection, alongside a fortnightly collection of non-recyclable waste (using wheelie bins) for residential properties within the Borough. In line with the Code for Sustainable Homes the revised draft SPD requires that provision is made for recycling/waste storage in new residential development.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Thames Water Property Services	17	2	pg 19	Object to reference to macerators as they place additional biological load on the STW treatment processes and erodes spare capacity.	Agreed, reference to macerators has been removed from the revised SPD.
Gina Adams		179	20	pg 19	The use of prefabricated components just off-sets the waste production so that it occurs somewhere else. It may be better for Swindon Borough Council, as the waste is not part of your local landfill but is no better for the planet and should not be considered a target for sustainability.	The SPD has been revised to incorporate the Code for Sustainable Homes and the BREEAM standard within an overall "Swindon Standard". Guidance on the environmental impact of materials is included in both standards.
	Taylor Woodrow Developments Ltd	161	6	pg 19	In principle accept that sufficient storage space should be provided. However question the ability of the Borough Council to collect on a regular basis. Until such times as a reliable collection service is available W2 cannot be	Following adoption of the Borough Council's new Municipal Waste Strategy, the Council are in the process of introducing a weekly kerbside recycling collection, alongside a fortnightly collection of non-recyclable waste (using wheelie bins) for residential properties within the Borough. In line with the Code for Sustainable Homes the revised draft SPD requires that provision is made for recycling/waste storage in new residential development.
Danny Myers		184	2	pg 2	It seems ironic that only 5% of the Front Garden development are expected to reach this standard.	The requirements of the SPD cannot be applied retrospectively. However the Council is encouraging the highest possible standards on

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	11	pg 2	Energy efficiency standards should be extended to existing buildings that are seeking planning permission for renovations or extensions or are put up for sale. Up to 84% of Swindon's housing stock may have been built before 1976. The SPD should require that developers or homeowners carry out a Home Energy audit and introduction of energy efficiency measures as a requirement of obtaining planning permission	The Borough Council have adopted a phased approach to the implementation of the SPD, initially the SPD will apply only to 'major' development. 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
Ms Deborah	Joffe	154	9	pg 2	Would like to see the definition of 'major development' revised downwards so that smaller developments are also included, since these add up to significant amounts of new build across Swindon. There seems no reason to exempt any new build, but we urge that whatever minimum can be applied is applied.	Applying the SPD to major development only will capture 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 future.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	8	pg 2	<p>Much of the existing housing stock around the Borough is well below sustainable building standards, particularly the Victorian stock. Yet it will mainly still be in use for the next 100 years or so. Significant impact would be made on carbon emissions by upgrading existing stock as well as by slowly adding more efficient stock. The SPD should include examining measures that would reduce the carbon footprints of existing buildings.</p>	<p>This is outside the scope of the SPD, future reviews of the SPD can provide opportunity to widen the scope of the SPD.</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wroughton Parish Council	51	4	pg 2	In reference to financial viability, developers know the regulations and therefore should comply, and not for the standards to be lowered.	Cost assessment studies have been undertaken for English Partnerships/Housing Corporation, and the Environment Agency, which have identified what is technically achievable now. Whilst the Council recognises that urgent action is required to combat the effects of climate change and utilise natural resources in a more sustainable manner, the Council also appreciates that implementing more sustainable methods of design and construction is also reliant on advice, expertise and the availability of components from a range of organisations which are not controlled by the Council. Efforts to increase the sustainability of new buildings could therefore be frustrated if proper systems and guidance are not in place. The revised SPD therefore includes an element of flexibility if a developer can demonstrate that reaching the "Swindon Standard" would be impractical or render the development unviable.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	19	pg 2	Where a developer can demonstrate that meeting the sustainability standards defined is either impractical or it renders the development unviable, the most serious consideration should be given to whether the building can be permitted at all. If it is decided that it should go ahead, then negotiation should be used to agree mitigation with the developer.	Demonstrating unviability/impracticality will be
SBC Renewable Energy Task Group	186	1	pg 2	All future homes to be built to the best available sustainability standards available at the time - this is currently the BREEAM 'Eco-homes' standard of 'excellent'. It would also be useful for the document to contain good examples of what existing 'excellent' standard homes look like and the likely features they contain	Agreed, further research is required on good examples for inclusion in the next draft.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network	166	6	pg 2	<p>The Code for Sustainable Homes sets out minimum standards for water and energy efficiency at every level of the code, thereby requiring specific levels of performance in order to achieve a high overall rating. If the SPD is to deliver sustainability benefits above and beyond these emerging national regulations, it should include carbon emission reduction targets for waste and materials.</p> <p>Require higher level carbon emission targets for waste and materials than the 'entry-level only' targets required in the new Code.</p> <p>Include carbon emission targets for the whole lifecycle of a development, including construction and decommissioning, not just during the occupancy phase require by the Code.</p>	<p>A carbon emissions reduction target is implicit within the Code for Sustainable Homes/BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon dioxide emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
SBC Renewable Energy Task Group	186	2	pg 2	Non-domestic, insist on the BREAAAM 'Excellent' standard for all future major development with immediate effect to include the maximum percentage renewable energy technology appropriate to the development.	The revised SPD requires major non-residential development to meet the BREEAM "Excellent" standard. The Council has adopted a flexible timescale to the implementation of the SPD. The "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the impact of the guidance.
South Marston Parish	70	3	pg 2	There is a lack of clarification of when and how the contents of the SPD become a major planning consideration.	The revised SPD has a simplified structure which provides a more user-friendly document which clearly sets out the "Swindon Standard" and what is required to meet it. The SPD also includes an implementation plan.
Countrywide Homes Ltd	164	1	pg 2	The SPD is unsound and contrary to national planning guidance/statements and the development plan for Swindon.	The SPD is based on policy in the adopted Local Plan, on the draft Regional Spatial Strategy and the outcomes of Swindon's Renewable Energy Task Group. The required "Swindon Standard" uses as a base the Code for Sustainable Homes and BREEAM standard which have Government endorsement.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network	166	11	pg 2	Of particular concern are the exemption of current land deals and the references to non-viability. We accept that the Council is bound by law in this respect, but it is vital that these standards are applied to the great majority of new buildings from as early as possible a date. The SPD should state that all new homes must meet the best available at the time the properties are built, not at the time planning consent is granted.	The requirements of the SPD cannot be applied retrospectively. Construction standards required by a detailed planning permission cannot be amended at a later date. Where outline consent has already been granted, the Council will seek to negotiate improved standards but cannot require them.
South Marston Parish	70	2	pg 2	The SPD is assumed to apply to all planning applications yet there is little indication of how it will apply to extensions to existing buildings, change of use of existing buildings and how it relates when a site has outline but no detailed planning permission. This should be clarified as developers will need to know if it is the only the additional impact that needs to be considered and how that might be calculated when cumulative impact is relevant.	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	6	pg 2	The aim should be to exceed the BREEAM Eco-homes 'Excellent' standard. Would particularly welcome inclusion in the SPD of targets on Carbon Dioxide emissions (aiming for carbon neutrality before 2016), as well as a requirement for developers to provide access to major developments any public transport, and the need for cycle parking.	For residential development the Code for Sustainable Homes "Level 3" is currently the industry standard, and is now being applied on all publicly funded schemes. It represents a challenging but achievable standard. Carbon dioxide emission reductions are implicit in the requirements of the SPD. Transport is beyond the scope of the SPD.
Wiltshire Wildlife Trust	38	2	pg 2	Strongly recommend that a similar standard be applied to smaller developments. In particular, urban renewal schemes, whilst mostly consisting of small individual developments, may occur on a wide enough scale to be classed as major development	Initially, the revised SPD will apply only 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

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	5	pg 2	It appears that the draft SPD was published at the same time as the Government's new 'Code for Sustainable Homes', which builds upon the BRE Eco-Homes system. According to the Government's draft planning policy statement on climate change local standards for new homes should be based on this Code, although higher standards are not ruled out (Paras 31 & 32). Assume that the Council will take account of the Code in revising the current SPD draft.	For residential development the SPD is now aligned to the Code for Sustainable Homes "Level 3".
Countrywide Homes Ltd	164	6	pg 2	There appears to be a question mark over delivery of Eco-home 'Excellent' on all development sites. In such circumstances there must be a recognition that a windfall site would contribute to building sustainable and inclusive communities, as well as providing affordable housing, without necessarily achieving Eco-homes 'Excellent'.	The revised SPD requires all new major residential development to meet Code for Sustainable Homes "Level 3". Code Level 3 is the requirement for all new publicly funded development and benefits from detailed costs studies. This standard represents a challenging but achievable basis for the "Swindon Standard". Following a proposed transition period the SPD will initially only apply to major development. In addition the SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network	166	13	pg 2	Would like to see the definition of 'major' development revised downwards so that smaller developments are also included, since they add up to significant amounts of new build across Swindon. There seems no reason to exempt any new build, if it can't be built sustainable, it should not be built at all.	Initially, the revised SPD will apply only 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
Countrywide Homes Ltd	164	5	pg 2	The draft supplement to PPS1 seeks to ensure that the overall costs of bringing sites to the market and, in particular, ensure the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3. It is considered that a blanket approach whereby all development is required to reach 'Excellent' standard may prohibit that goal.	Housing delivery is a key objective. However, it is also important to ensure that housing is as sustainable as possible. To this end the SPD implementation plan allows a transition period and the SPD also includes flexibility if the development is not considered viable/practical.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	2	pg 2	Research by Cyril Sweett for BRE indicates that to achieve an Eco-Homes 'Excellent' rating on a 'typical' house increases the capital cost by up to 6.9%. This is considered to be a significant increase that is not accounted for within the SPD. This could have knock on effects on the delivery of housing within Swindon, and may, in particular circumstances, have an impact on the viability of proposed development.	The requirements in the SPD will increase costs by a small margin. However the Council are proposing a transition period before the requirements of the SPD are limited. The SPD also includes an element of flexibility where a developer can demonstrate that reaching the "Swindon Standard" would be impractical or render the development unviable. The Council would also highlight that the marketing of the benefits of sustainable homes should be exploited.
Swindon Climate Action Network	166	10	pg 2	The current (inadequate) energy efficiency regulations for new homes were introduced in 1985. There has not been a single prosecution for non-compliance, yet 43% of new homes that have received a compliance certificate should have failed. Would like to see a commitment to enforcement contained in the SPD.	Compliance with the Code for Sustainable Homes will be ensured by the Building Research Establishment (BRE). The Code for Sustainable Homes requires assessment at the design stage and at post-construction. Enforced through
Countrywide Homes Ltd	164	3	pg 2	The SPD should make reference to the Code for Sustainable Homes as replacement to BREEAM's Eco-Homes standard.	Agreed, the revised SPD is aligned with the Code for Sustainable Homes.

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Countrywide Homes Ltd	164	4	pg 2		Achievement of the Eco-homes 'Excellent' standard is considered to be an excessive benchmark for all new development, and may prohibit housing development in Swindon. In particular smaller development sites where the cost of delivering the required standard would be	The revised SPD requires all major development to meet Code for Sustainable Homes "Level 3" and/or BREEAM "Excellent". Code Level 3 is the requirement for all new publicly funded development and benefits from detailed costs studies. BREEAM "Excellent" is a well-known industry standard which has been around for a number of years. These standards represent a challenging but achievable basis for the "Swindon Standard". Sites of less than 10 dwellings or less than 1000 metres for all other uses would be exempt. The Council has adopted a flexible timescale to the implementation of the SPD and the SPD also includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable.
Marc Argent	185	3	pg 2		In the light of the need to be ambitious and to show leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20-25% in the first year, with annual increases at a rate which will lead to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	7	pg 2	Wonder whether the Council intends to use the SPD as the "development plan document" that might be needed (ref Para 31 of the draft Climate Change PPS), where higher levels of building performance are required than those set out in the Code for Sustainable Homes.	The SPD builds on current policy within the adopted Swindon Borough Local Plan. The requirements of the SPD use local plan policy as a basis, alongside energy requirements in the draft Regional Spatial Strategy and the findings of Swindon's Renewable Energy Task Group.
Ms Deborah	Joffe	154	8	pg 2	Would welcome the maximum extension of the policy to include renovations and refurbishments on existing buildings.	Initially, the revised SPD will only apply to major development. The scope of the guidance will be reviewed in the future.
	SBC Renewable Energy Task Group	186	7	pg 2	Introduce two-tier standard to ensure all new developments are more sustainable: Standard 1: Developments of less than 10 dwellings and/or 1000 square metres. Standard 2: Developments of more than 10 dwellings	Initially, the revised SPD will apply only to 'major' development. This 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 future.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	SBC Renewable Energy Task Group	186	8	pg 2	Include the renovation and refurbishment of all existing buildings by requiring developers and/or homeowners to submit a completed Home Energy Conservation survey form with the planning application. Planning approval would only be granted once any requested energy efficiency works had been completed.	The SPD will initially only apply to major development. The scope of the guidance will be reviewed in future.
Danny	Myers	184	4	pg 2	What about the majority of property that already exists, how does this fit into the draft SPD?	This issue falls outside the scope of the SPD, which will apply to major new development only. Other SBC initiatives will be tackling this issue. The scope of the SPD may be revised in the future.
Simon	Bridewell	171	2	pg 2	In order to meet carbon emission reduction targets should be requiring 50% renewable energy with 12% annual increases.	The revised draft SPD now includes a zero/low energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	14	pg 2	The SPD should make specific and enforceable requirements rather than providing advice and asking for consideration to be given. The summaries should state: "Development proposals must address the following issues".	The requirements of the SPD have been strengthened, and aligned to the Code for Sustainable Homes/BREEAM standard, which have been endorsed by the Government.
	Taylor Woodrow Developments Ltd	161	1	pg 2	Concerned that the document imposes requirements that are not set in Government legislation. Additionally its mandatory nature will lead to schemes that are perfectly acceptable in terms of current Building Regulations to be deemed unacceptable in relation to the guidance note and consequently at risk of being refused planning permission. This could be overcome by changing its mandatory nature to a voluntary code of conduct.	The Government have clearly set out their stall in terms of sustainable development, through the new Code for Sustainable Homes, the consultation document 'Building a Greener Future' and the consultation draft PPS on Climate Change, which provide a framework for using these standards as a basis for local requirements.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	East Swindon Development Group	82	10	pg 2	The approach set out in the draft SPD does not consider the technical and practical issues relating to the approach chosen and as such, since the policy develops that in the development plan, is not robust.	The Council has adopted a flexible timescale to the implementation of the SPD. The "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the impact of the guidance. The revised SPD includes an implementation plan which, following on from the short transition period, outlines a phased approach to implementation.
Adam	Vickers	178	3	pg 2	In the light of the need to be ambitious and to show leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20-25% in the first year, with annual increases at a rate which will lead to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Adam	Vickers	178	5	pg 2	Would also welcome the maximum extension of the policy to include renovations and refurbishments on existing buildings and the threshold for developments which have to abide by the document to be lowered to include as many new buildings as possible.	Initially, the revised SPD will apply only 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 due course.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
East Swindon Development Group	82	9	pg 2	Object to the requirement that all future development must meet the Eco-homes 'Excellent' standard. The requirement needs to be revisited in the light of emerging national planning guidance. It will be necessary to reconcile on the revised approach to be adopted by the Borough Council, in particular because of the different technical requirements and cost implications which will need to be considered prior to the approval of a policy framework.	The revised SPD requires all new major development to meet Code for Sustainable Homes "Level 3" and/or BREEAM "Excellent". Code Level 3 is the requirement for all new publicly funded development and benefits from detailed costs studies. BREEAM "Excellent" is a well-known industry standard which has been around for a number of years. These standards represent a challenging but achievable basis for the "Swindon
Swindon Civic Trust	108	3	pg 2	It would be sensible if the cost of the measures were free of VAT (where normally applicable).	There are a number of Government initiatives which offer financial incentives for more sustainable construction.
Platform Design UK	176	3	pg 2	In the light of the need to be ambitious and to show leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20-25% in the first year, with annual increases at a rate which will lead to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. Future reviews of the SPD will provide the scope to amend this

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Simon	Bridewell	171	3	pg 2	References to the BREEAM 'Excellent' standard should be amended to refer to the Code for Sustainable Homes, and additionally the SPD should state that new developments must meet the highest standard available at the time of	Agreed, the revised SPD now requires new major residential development to meet the Code for Sustainable Homes Level 3 standard. The Borough Council cannot enforce a higher standard than that agreed at the granting of planning permission. However the Council can negotiate, particularly where there has been a change in national
Adrian	Read	170	3	pg 2	Concerned the requirement to meet the BREEAM 'Excellent' standard is seen as an aspirational target, when it should be seen as the	The requirements in the SPD has been strengthened, and aligned to the Code for Sustainable Homes/BREEAM standard, which have been endorsed by the Government
Annie	Whitford	175	5	pg 2	Would also welcome the maximum extension of the policy to include renovations and refurbishments on existing buildings and the threshold for developments which have to abide by the document to be lowered to include as many as many new buildings as possible.	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	17	pg 2	Have serious concerns that the proposed policies add an additional burden on development in Swindon at point in the development cycle where the outcome of a development is far from certain. These policies require a substantial increase in skill and personnel resources to determine the validity of supplementary information supplied in planning applications to meet these policies.	The Council has adopted a flexible approach to the implementation of the SPD. The "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the
Nationwide Building Society	160	3	pg 2	Object to the requirement to meet BREEAM's 'excellent' standards. This is a commendable objective but should be aspirational and take in to consideration the site specific and occupier	The revised SPD requires all new major development to meet Code for Sustainable Homes "Level 3" and/or BREEAM "Excellent". Code Level 3 is the requirement for all new publicly funded development and benefits from detailed costs studies. BREEAM "excellent" is a well-known industry standard which has been around for a number of years. These standards therefore represent a challenging but achievable basis for the "Swindon Standard". The Council has adopted a flexible timescale to the implementation of the SPD and the SPD also includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Annie	Whitford	175	3	pg 2	In the light of the need to be ambitious and to show leadership in greenhouse gas reductions, would like to see starting targets for renewable energy at 20-25% in the first year, with annual increases at a rate which will lead to 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
	Nationwide Building Society	160	2	pg 2	Object to the requirement to supply 15% of the buildings energy requirements by on site renewable energy. This is a commendable objective but should be aspirational and take into consideration the site specific and	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Simon	Bridewell	171	11	pg 2	The SPD covers new build development but does not address the existing housing. Additional standards should be introduced as conditions of gaining planning permission for extensions and renovation.	Initially, the revised SPD will apply only 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

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Simon	Bridewell	171	5	pg 2	If meeting the standards required in the SPD makes a development unviable then the development should not go ahead, otherwise it offers too much of a loophole.	Demonstrating viability/impracticality is a rigorous process. The Code for sustainable Homes has been subject to detailed cost studies and the BREEAM standard is a well-known industry standard which has been around for a number of years. These standards represent a challenging but achievable basis for the "Swindon Standard".
	Modus	106	1	pg 2	The requirement to meet BREEAM's 'Excellent' standard is considered to be excessive and would represent a significant additional financial burden on new development.	The SPD has been revised to apply to major development only, and will require new major development to meet Code for Sustainable Homes Level 3 and/or BREEAM "Excellent". Code Level 3 is the requirement for all publicly funded development and benefits from detailed costs studies. BREEAM "Excellent" is a well-known industry standard which has been used for a number of years. These standards represent a challenging but achievable basis for the "Swindon Standard". Following a proposed transition period the SPD will initially only apply to major development. In addition the SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable.

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Modus	106	3	pg 2		The renewable energy requirement is also considered to be excessive, and in some cases, impractical. It would represent a significant additional financial burden on new developments. This requirement should be reduced such that: "All new development should actively seek to incorporate on site renewable energy supplies where practical, subject to viability".	The revised draft DPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The revised SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry.
Helen Parker-Drabbl	173	5	pg 2		Would welcome the extension of the policy to include renovations and refurbishments on existing buildings and the threshold for developments which have to abide by the document to be lowered to include as many new buildings as possible.	Initially, the revised SPD will apply only 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

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Nick	Stenning	174	3	pg 2	The on-site renewable energy target is admirable insofar that it goes further than any other local government planning guidelines, but must recognise that it will still only lead to a maximum of 40% reduction in energy use by 2030. Would like the Council to consider revising the targets upwards in order to aim for a 90-100% reduction in emissions from the whole lifecycle of any development by 2030. An initial target of 20-25% energy from renewable is achievable, with increments for following years starting at 2-4% and increasing later on to hit the target of 100% by 2030.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The SPD includes an implementation plan which sets out a
	Platform Design UK	176	5	pg 2	Would also welcome the maximum extension of the policy to include renovations and refurbishments on existing buildings and the threshold for developments which have to abide by the document to be lowered to include as many as many new buildings as possible.	Initially, the revised draft SPD will apply only 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 guidance. The scope of the guidance will be

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Okus Area Residents Association	156	3	pg 2	Surely the Eco-home excellent standard can be applied the SDA development.	The sustainability standard for residential development at Wichelstowe was set within the outline planning permission. The Borough Council can encourage any developers to apply higher sustainability standards, in accordance with the Government's new Code for Sustainable Homes. However, there is no statutory planning mechanism to insist on this.
Adrian	Read	170	7	pg 2	The SPD needs to apply to all new build in the Borough, not just major developments. It also needs to be extended apply to renovation and extensions of existing	Initially, the revised SPD will apply only 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
Andy	Parsons	167	12	pg 2	Would like to see the definition of 'major development' revised downwards so that smaller developments are also included, since these add up to significant amounts of new build across Swindon. There seems no reason to exempt any new build. If it can't be built sustainably, it should not be built at all.	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in future.

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Modus	106	2	pg 2	There is also a very real risk that such a standard is not achievable in many instances, such as conversions of existing buildings or structures (including historic buildings) and, as such, could preclude such developments.	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the
Andy	Parsons	167	10	pg 2	Of particular concern are the exemption of current land deals and the references to non-viability. Accept that the Council is bound by law in this respect, but it is vital that these standards are applied to the great majority of new buildings from as early as possible a date. The SPD should state that all new homes must meet the best available at the time the properties are built, not at the time planning consent is granted.	The requirements of the SPD cannot be applied retrospectively. Construction standards required by a detailed planning permission cannot be amended at a later date. Where outline consent has already been granted, the Council will seek to negotiate improved standards but cannot require them.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	9	pg 2	Would like to see a commitment to enforcement contained in the SPD. Not only are the current energy efficiency regulations for new homes inadequate, they are also not enforced. Introduced in 1985, there has not been a single prosecution for non-compliance, yet 43% of new homes that have received a compliance certificate should have failed.	Compliance with the Code for Sustainable Homes will be ensured by the Building Research Establishment (BRE). The Code for Sustainable Homes requires assessment at the design stage and at post-construction, and enforced through planning conditions.
Jane	Gourley	180	2	pg 2	You state that if it were impractical or unviable to implement these standards a lower standard may be accepted. You fail to expand on this. Under what circumstances might a lower standard be accepted, and how low a standard? Perhaps the criteria should be made clear, otherwise might not all developers try to claim they are impractical or unviable? Concern is that this one little sentence might be a "get out clause" which could render so much of this valuable document worthless.	The viability process is defined in the revised SPD. Impracticality will be assessed in co-ordination with the Building Research Establishment (BRE).

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
CPRE - North Wilts and Swindon	16	3	pg 2	Would ask that all renovations and refurbishments of existing buildings be subject to the same requirements and that the threshold for new developments be lowered to cover all new	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	5	pg 2	<p>The Code for Sustainable Homes sets out minimum standards for water and energy efficiency at every level of the code, thereby requiring specific levels of performance in order to achieve a high overall rating. If the SPD is to deliver sustainability benefits above and beyond these emerging national regulations, it should: include carbon emission reduction targets for waste and materials.</p> <p>Require higher level carbon emission targets for waste and materials than the 'entry-level only' targets required in the new Code.</p> <p>Include carbon emission targets for the whole lifecycle of a development, including construction and decommissioning, not just during the occupancy phase require by the Code</p>	<p>A carbon emissions reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.</p>
	Okus Area Residents Association	156	4	pg 2	<p>If 'retrofitting' is being considered for existing developments why is the SDA not being included.</p>	<p>Para 2.12 of the report to the 12th December Planning Committee was referring to the refurbishment of existing buildings and not to sites which have the benefit of planning permission but have yet to be started.</p>

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Okus Area Residents Association		156	5	pg 2	As the council are committed to making Swindon the UK's most sustainable place, and are boasting that the SDA will be a wonderful example to UK and Europe of an excellent design and a sustainable community, why will the SPD not be applied to the SDA.	The sustainability standard for residential development at Wichelstowe was set within the outline planning permission. The Borough Council can encourage any developers to apply higher sustainability standards, in accordance with the Government's new Code for Sustainable Homes, however there is no statutory planning mechanism to insist on this.
Ms Deborah	Joffe	154	7	pg 2	Major concern is enforceability, whatever measures can be taken to insist and/or strongly encourage developers to accept the standards should be taken. Of particular concern are the exemption of current land deals and the references to non-viability. Accept the Council is bound by the law in this respect, but it is vital that these standards are applied to the great majority of new buildings erected in Swindon from as early as possible a date.	The SPD cannot be applied retrospectively to sites which already have planning permission. The revised SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. In these cases, developers will need to enter into early discussions with the Council. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are considered impractical, the Council may commission an expert third part to verify such a claim. A short transition period prior to implementation of this guidance to put in place systems to maximise the impact of the guidance.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina	Adams	179	9	pg 2	The standards should be applied across all developments and not just above the threshold of 10 dwellings.	Initially, the revised SPD will apply only 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
Gina	Adams	179	10	pg 2	The standards should be extended to existing buildings that are seeking planning permission for renovations or extensions. The greatest impact on carbon emissions is likely to be through ensuring that existing housing are well insulated and energy efficient. A home energy audit and introduction of energy efficiency measures should be a requirement of obtaining planning permission for existing buildings for renovation or extensions etc.	Existing housing is outside the scope of the SPD, which initially will apply only to major development The scope of the guidance will be reviewed in the future.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina	Adams	179	11	pg 2	Off-setting must only be allowed in exceptional circumstances. Understand that in such circumstances the developers would be required to pay the costs of applying the SPD to another project, thereby 'off-setting' their exemption. However this is not mentioned in the SPD, it's inclusion is essential. Find it hard to envisage a situation where a situation where a developer could be excused these sustainability measures. If they cannot build sustainably, would argue that they should not be allowed to build at all.	The reference to payment of commuted sums has been removed from the revised SPD. In cases where meeting the "Swindon Standard" would be impractical, or would render the scheme unviable, a negotiated solution may be accepted. Developers would need to enter into early discussions with the Council in this circumstance.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina	Adams	179	5	pg 2	Although the requirements should only be relaxed under exceptional circumstances, I would question why a building should be allowed at all, if it can't be built to high sustainability standards.	The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry. In these cases, developers would need to enter into early discussions with the Council. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are considered impractical, the Council may commission an expert third party to verify such a claim.
	Wiltshire Wildlife Trust	38	12	pg 20	In the final paragraph reference should be made to indicate that the effects of light pollution also applies to wildlife.	Agreed, the SPD has been amended accordingly.
Gina	Adams	179	21	pg 20	The bullet point on auditing materials should be changed from 'assess the extent' to 'maximise the use of'.	The SPD has been revised to align to the Code for Sustainable Homes and BREEAM standard, which include detailed guidance and standards on materials.
	Thames Water Property Services	17	6	pg 22	Water consumption in the Borough currently equates to around 155 litres per person per day.	The SPD will be amended

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	3	pg 22	The principals of SUDS are already established, and regulation and control by the Environment Agency and the water companies and need not be repeated.	The SPD promotes use of SUDS as part of an holistic approach. The identification of additional guidance is indicated in the Further Sources of Information section.
Thames Water Property Services	17	4	pg 22	Thames Water recommend the installation of a properly maintained fat trap on all catering establishments to avoid the possibility of blocked drains, sewage flooding and pollution to local watercourses. Waste oil can be recycled for the	This is a detailed matter which falls outside the scope of the SPD.
RIBA Wiltshire Branch	168	7	pg 22	Reed bed, natural sewage treatment systems should also be encouraged where there is sufficient landscape space available.	Guidance on SUDS is provided in the SPD and additional technical guidance is available from the Environment Agency.
RIBA Wiltshire Branch	168	6	pg 22	Water management group systems, which are shared between 10 to 20 houses, may in many cases be more appropriate than individual systems so that the cost and responsibility of maintenance is shared.	Guidance on water management is provided in the SPD and additional technical guidance is available from the Environment Agency.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Taylor Woodrow Developments Ltd	161	7	pg 22	These initiatives are already covered in other legislation and by other bodies, to include them would be duplication. Also aware that BRE are currently having difficulty with the ability to achieve the water use element of the Code for Sustainable Homes, it is therefore likely this element will be relaxed from the current thinking.	The draft Climate Change supplement to PPS1 (Dec 2006) highlights in Para 30 that "Planning Authorities should be concerned with environmental performance of new development." For new homes, the supplement also encourages standards to be based on the Code for Sustainable Homes. A framework for introducing sustainable design requirements through planning is therefore in place. All technical guidance relating to the Code for Sustainable Homes is now available.
RIBA Wiltshire Branch	168	5	pg 22	There are potential maintenance and management issues which can pose consequential public health risks, these need to be considered, perhaps by the promotion of standard agreements.	Agree, future management/maintenance is a key issue which is implicit in the SPD.
Thames Water Property Services	17	3	pg 22	Sewers should be assumed to surcharge to just below cover level and as such basement areas without pumped drainage systems will be at greater risk of internal flooding. Part H of the Building Regulations recognises this and therefore suggest that it should be incorporated as part of the SPD.	This issue is a valid consideration for new development but is too detailed/outside scope of the SPD. Flood risk policies are in place in the adopted Local Plan, also covered in Building Regulations.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Swindon Civic Trust	108	20	pg 23	The SPD does not set a projected, sustainable target for mains water supply to new dwellings and the monitoring of actual use against the target. Targets should take account of the use of grey water and other conservation measures to	The SPD has been revised and is now aligned to the Code for Sustainable Homes which includes targets on water conservation.
Gina Adams		179	22	pg 24	Fitting of water meters should be mandatory.	All new development will be fitted with water meters, and Thames Water are also fitting water meters to existing property when there is a change of occupier.
	Thames Water Property Services	17	8	pg 24	Consider that the word 'expensively' should be removed from the second sentence.	This reference has been removed from the revised SPD, which has been aligned to the Code for Sustainable Homes and the BREEAM
	Swindon Civic Trust	108	21	pg 24	The diagram on page 24 is incorrect. The drinking water supply should be directly supplied to the kitchen, passing it through a storage tank is a health hazard.	Noted, this is currently being investigated and if required will be revised for an adopted version of the SPD.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
WM Morrison Supermarkets PLC	59	3	pg 24	Any policies on water efficiency should retain sufficient flexibility to take account of individual site conditions and to void placing undue burden on developers, which may affect the viability of developments.	The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry. In these cases, developers will need to enter into early discussions with the Council. The process for demonstrating "unviability" is detailed in the SPD. Where standards are impractical, the Council may commission an expert third party to verify such a claim.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Thames Water Property Services	17	7	pg 25	<p>It should be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require maintenance to ensure their effectiveness. Consider that the following paragraph should be included:</p> <p>"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 this is the major contributor to sewer flooding.</p>	<p>The SPD has been revised to require residential development to meet Code for Sustainable Homes Level 3 and non-residential development to meet the BREEAM "Excellent" standard. Both the Code and BREEAM require consideration of surface water drainage, which could involve the use/management of SUDS. Further technical advice is available from the Environment</p>

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
South Marston Parish	70	5	pg 25		<p>The term SUDS implies that it is not necessary or appropriate for rural areas. The SPD does not clarify this. Many rural areas experience severe flooding risk, and the Environment Agency is often not able to respond during the time set for decision on a live application. To overcome this the SPD needs to make some comment about the need in all cases for a SUDS feasibility study, or its equivalent, to be discussed at pre-application stage. Suggest amending the first sentence under WR3 to: "Development in both rural and urban areas can cause many impacts on the water environment." Similarly amend the first sentence of the second Para under the SUDS sub-heading to also refer to rural as well as urban areas.</p>	<p>SUDS is the nationally recognised term for sustainable drainage systems, and is equally applicable to rural areas. Appendix 3 of the SPD provides more detailed guidance on the various techniques available, and notes in particular that reed bed filtration in small, rural residential development can offer an effective</p>
Gina Adams	179	23	pg 25		<p>The amount of paved land for parking must be minimised.</p>	<p>This issue is a valid consideration for new development but falls outside the scope of the SPD. The use of SUDS can provide an effective water management solution in parking areas where appropriate.</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	9	pg 25	<p>Add the following paragraph: In addition care should be taken during the construction phase to minimise the effects of compaction on the soil. This may mean that areas designed as public open space and gardens be fenced to prevent unnecessary traffic movement especially in the winter months</p>	<p>The SPD has been revised to align with the Code for Sustainable Homes and the BREEAM standard which includes the Considerate Construction standard.</p>
Thames Water Property Services	17	9	pg 26	<p>Consider that the effect of development on water supplies and sewage network should be considered as part of the pre-application stage as follows:</p> <p>"Has the effect of the development on the potable water infrastructure been considered?" "Has the effect of the development on the waste water infrastructure been considered?"</p>	<p>Water use is now implicit in the revised SPD in line with the requirements of the Code for Sustainable Homes and the BREEAM</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	10	pg 26	Under the Detailed Design section the first bullet point should be altered as follows: "Has the integration of rain/grey water collection for flushing toilets and irrigating landscape	This is now addressed in the revised SPD in line with the requirements of the Code for Sustainable Homes and BREEAM standard.
Hannick Homes & Developments Ltd	84	9	pg 28	Most of these issues appear to be covered by other legislation.	The SPD has been aligned to the Code for Sustainable Homes and the BREEAM standard, both of which have been endorsed by Central Government, both standards have requirements on pollution.
RIBA Wiltshire Branch	168	4	pg 28	There is considerable potential to reduce water use by rainwater harvesting and grey water recycling. Water metering means that these techniques show a cost saving to consumers which will justify the capital cost of	Agreed, these are issues in the Code for Sustainable Homes and the BREEAM standard, which form the base standard within the revised

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	9	pg 28	The proposal to implement the 'Considerate Constructors Scheme' will simply address matters of nuisance to neighbours during construction, most of the issues included are in any case covered by health and Safety legislation and the CDM Regulations. The most significant issues arising from construction sites are the minimising of waste by careful design, efficient site organisation and management and the specification and sourcing of materials.	The revised SPD incorporates the Code for Sustainable Homes as a base standard. Within the Code is a requirement for Construction Site Waste Management Plans.
Persimmon & Redrow	85	10	pg 28	Most major mixed-use developments are required to be accompanied by an Environmental Statement. If the statement is scoped properly, all of these matters raised in this section would be covered in due course. Duplication of other statutory legislation at local level seems unnecessary	The requirements of an Environmental Statement do not omit the need to comply with the requirements in the SPD. Information used for the SPD would naturally feed into any Environmental Statement, and vice versa.
Taylor Woodrow Developments Ltd	161	8	pg 28	Minimising pollution is covered by other	Minimising pollution is covered in the requirements of the Code for Sustainable Homes and the BREEAM standard.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	8	pg 28	It is unclear how building sites can be seen as a significant source of pollution, there is a raft of existing legislation controlling the industry in this respect. The main sources of pollution are predominantly production, manufacturing and transport , which are not included in the SPD.	Minimising pollution from construction sites is covered in the requirements of the Code for Sustainable Homes and the BREEAM standard. These standards also address the issue of the environmental impact of materials production.
Wiltshire Wildlife Trust	38	13	pg 29	An extra question should be inserted, to appropriately account for the affects on wildlife resulting from pollution such as uncontrolled light: "Has the site been subject to ecological surveys, especially for species that may be affected by disturbance and light	Ecological impacts are covered in the Code for Sustainable Homes and the BREEAM standard, which have been incorporated into the revised

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	22	pg 29	Object to P3 as it does not encourage alternative means of non-polluting transport such as cycling. The SPD should include the following: "All developments should be expected to encourage and facilitate cycling, so as to minimise pollution from motor vehicles, through improved accessibility, e.g. links to cycle networks and provision for secure cycle storage.	Transport is a key consideration in new development. However, transport issues are outside the scope of this SPD.
Wiltshire Wildlife Trust	38	11	pg 29	The final sentence of the second paragraph should be altered as follows: "This may be calculated using the 'Proximity Principle' in sourcing raw materials and waste disposal sites, and could also form part of an EMS."	The SPD is now aligned to the requirements in the Code for Sustainable Homes and the BREEAM standard, which addresses raw materials and their environmental impact.
Swindon Civic Trust	108	23	pg 29	Object to P4 because recognise that uncontrolled use of wind turbines and solar panels in current high-density developments may constitute pollution, and certainly a loss of quality of life. The SPD should include guidelines for the location of this	Detailed guidance on renewable energy technology and installation and amenity issues is provided for in other guidance, for example the Local Plan and the companion guide to PPS22: Renewable Energy.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
The New Swindon Company	104	7	pg 3	The guidance is very long and covers a wide range of issues. It could be structured to highlight strategic, local and detailed issues more succinctly and enable these matters to be identified without the need to read the entire	The SPD has been revised, a simplified structure provides a more user-friendly document which clearly sets out the "Swindon Standard" and what is required to meet it.
SBC Renewable Energy Task Group	186	3	pg 3	In the case of longer term developments, it is recommended that the Council, as planning authority, require developers to build to the best available sustainability standards at the time the properties are built and not the best available sustainability standards available at the time of planning consent.	The requirements of the SPD cannot be applied retrospectively. Construction standards required by a detailed planning permission cannot be amended at a later date. Where outline consent has already been granted, the Council will seek to negotiate improved standards but cannot require them.
Swindon Civic Trust	108	1	pg 3	Object as the document is phrased in general terms and little or no reference is made to how the Borough should react in terms of its own needs.	The intention of the SPD is to provide detailed guidance on sustainable building design and construction to anyone (including the Council) submitting a planning application for 'major' development within the Borough.
Wiltshire Wildlife Trust	38	14	pg 30	An addition to the first question should be inserted: "Has wildlife been taken	This issue is now implicit in the SPD, with alignment to the Code for Sustainable Homes and BREEAM standard.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	RIBA Wiltshire Branch	168	10	pg 32	The specification of materials has a major affect on achieving sustainable development by the reduction of carbon emission and embedded energy. It is of great concern that so much emphasis is given to the "problems" of sustainable materials; their inappropriateness in the context of historic buildings and landscape? Their relationship to crime? The logic of these arguments are difficult to understand and indicates a willingness to perpetuate planning barriers and pandering to popular pre-conceptions.	The SPD will be considered in the context of all relevant planning policies, including those related to the context of historic buildings. Materials specification is included in the Code for Sustainable Homes/ BREEAM standard.
	Home Builders Federation	95	10	pg 32	The section is too prescriptive and unnecessary.	Materials is included in the provision of the Code for Sustainable Homes, which has been incorporated into the revised SPD.
Andy Parsons		167	16	pg 33	The use of natural paint should be a requirement, solvent based paints give off potent greenhouse gases.	This is not implicit in the guidance however both the Code for Sustainable Homes and the BREEAM standard require consideration of the environmental impact of materials.

			<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network			166	16	pg 33	All windows should be made of FSC wood, the manufacture and disposal of PVCu windows is extremely damaging to the environment, releasing toxic compounds and being energy intensive to manufacture. You can have triple glazed windows, this has been going on in Sweden for decades.	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Adrian	Read		170	9	pg 33	The material used for timber preservation should be specified to produce low levels of greenhouse	The environmental impact of materials is implicit in the Code for Sustainable Homes/BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Adrian	Read		170	8	pg 33	It is possible to have triple glazed wooden windows, most properties in Sweden have been triple glazed for very many years.	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Simon	Bridewell	171	9	pg 33	The use of wood from certified sources in windows should be	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Gina	Adams	179	24	pg 33	It should be a requirement that FSC wood or other accredited sustainable scheme must always be used. The Council should investigate the ability of being able to claim the carbon credits for FSC wood used in developments, as a contribution towards carbon emission targets.	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Gina	Adams	179	25	pg 33	The advice for timber windows rather than UPVC should be strengthened to a requirement and extended to all other uses of UPVC, e.g. doors. UPVC should not be allowed, as it is an incredibly energy intensive and environmentally damaging	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	CPRE - North Wilts and Swindon	16	8	pg 33	Use of primary resources such as soft sand for blocks must be avoided Its use triggers the pits created for landfill use which in itself is to be	The environmental impact of materials is implicit in the Code for Sustainable Homes/BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Andy	Parsons	167	15	pg 33	All windows should be made of FSC wood, the manufacture and disposal of PVCu windows is extremely damaging to the environment, releasing toxic compounds and being energy intensive to manufacture. You can have triple glazed windows, this has been going on in Sweden for decades.	The environmental impact of materials is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD. Further guidance can be found in the "Green Guide" published by the Building Research Establishment
Andy	Parsons	167	17	pg 33	Energy inefficient fixtures and fittings should be prohibited, all light fittings should be fitted with low energy lighting.	Energy efficiency is implicit in the Code for Sustainable Homes/ BREEAM standard, which have been incorporated into the revised SPD.
	Wiltshire Wildlife Trust	38	15	pg 33, 34	Should be more emphasis on Environmental Management Systems, add the following to the end of each section: "This should be part of any Environmental Management System."	Agreed, the SPD has been amended accordingly. Energy management is implicit in the Code for Sustainable Homes and BREEAM standard, which have both been incorporated as a base standard in the revised SPD.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Adrian	Read	170	10	pg 34	Traditional gloss paints are very high in solvents with a big climate effect.	Both the Code for Sustainable Homes and the BREEAM standard require consideration of the environmental impact of materials.
	Swindon Climate Action Network	166	17	pg 34	The use of natural paint should be a requirement, solvent based paints give off potent greenhouse gases.	Both the Code for Sustainable Homes and the BREEAM standard require consideration of the environmental impact of materials.
Simon	Bridewell	171	10	pg 34	This should be re-worded to prohibit the use of solvent based paints, rather than just pointing out the benefits of the	Both the Code for Sustainable Homes and the BREEAM standard require consideration of the environmental impact of materials.
Gina	Adams	179	26	pg 34	The advice to use natural paints should be strengthened to a requirement. Petroleum based paints are a source for potent greenhouse gas. The Council could benefit towards its carbon emission reduction target	Both the Code for Sustainable Homes and the BREEAM standard require consideration of the environmental impact of materials.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	16	pg 35	<p>The fourth bullet point should be altered to read:</p> <p>"Have materials been sought from local suppliers sourced locally in or near Swindon?"</p> <p>Local suppliers may not purchase supplies from a local source, as they may be cheaper from further away. To minimise contributions to climate change and other damaging effects on the environment, supplies should come from as close to the development site as</p>	<p>The issue of materials is implicit in the Code for Sustainable Homes/ BREEAM standard which has been incorporated into the revised SPD.</p>
Wiltshire Wildlife Trust	38	17	pg 37	<p>The following text should be added after the first paragraph:</p> <p>"This can help the Council, and other public bodies to fulfil the Biodiversity Duty under the Natural Environment and Rural Communities Act (NERC) 2006, to have regard for conserving biodiversity. This includes restoring or enhancing a population or habitat."</p>	<p>Agreed, this will be incorporated in to the final draft of the SPD.</p>

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina Adams		179	27	pg 38	Green roofs only provide wildlife habitat for animals that fly. Do not forget all those ground dwelling animals and ensure that provision is made for wildlife corridors for them.	This issue is a valid consideration in new development but falls outside the scope of the SPD. Policies in the adopted Local Plan provide guidance provision for wildlife.
	Wiltshire Wildlife Trust	38	19	pg 39	The final sentence should be altered to read: "Native species of local provenance should be used."	Whilst the Borough Council accept that use of species of local provenance is preferable, the Borough Council consider that the proposed wording is too prescriptive, given that species of local provenance may not always be
	Swindon Civic Trust	108	24	pg 39	Object as developers should take particular account of specific green corridors and areas in Swindon, such as country parks, so that neighbouring new developments compliment their biodiversity.	This issue is a valid consideration of new development but falls outside the scope of the SPD. The adopted Local Plan provides guidance on country parks, green corridors and open space as well as guidance on protection of designated biodiversity

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	20	pg 40	The second paragraph should be altered as follows: "The creation of "urban habitats" can blur the distinction between urban and rural environment, amplifying the benefits of the green infrastructure network. Urban habitats can bring benefits not only to wildlife but also improve quality of life through contact with nature and green spaces. For example, green roofs.."	The Council consider that the proposed wording does not add to that already in the SPD.
RIBA Wiltshire Branch	168	12	pg 42	Lifetime Home standards generally concentrate on the flexibility of a house to adapt to the changing needs arising from old age or disability. The needs of an expanding or contracting family may however be more significant and will occur. These changes require extensions, alterations and change of building uses etc. all of which require a less restrictive and more imaginative development control system.	The Lifetime Homes standard does not cover extensions to dwellings. Changes to dwellings which require planning permission will be dealt with under the relevant planning

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Taylor Woodrow Developments Ltd	161	9	pg 42	The current Building Regulations standards, cover disabled access and internal provisions, and represent the appropriate vehicle to cover this issue and any required changes, which should also be at a national, and not, a local level	Lifetime Homes is an integral part of the Code for Sustainable Homes. The draft supplement to PPS1 requires that standards for residential residential should be based on the Code for Sustainable Homes, the revised SPD does this.
Okus Area Residents Association	156	9	pg 42	Should include specific reference to accessibility.	The revised SPD does make reference to accessibility, and sets out the Lifetime Homes requirements.
Okus Area Residents Association	156	8	pg 42	Should include specific reference to accessibility.	The revised SPD does make reference to accessibility, and sets out the Lifetime Homes requirements.
SBC Renewable Energy Task Group	186	6	pg 42	The Council needs to include greater detail on exactly what would be required to future proof the development in the B1 or A1B IPCC climate change scenarios.	The Council acknowledges that further research may be required on future proofing in respect of the IPCC climate change scenarios. Future revisions of this guidance will allow for
Okus Area Residents Association	156	6	pg 42	'Building for Change' should include specific reference to accessibility , not only for disabled persons but for aged persons, young mothers	The revised SPD does make reference to accessibility, and sets out the Lifetime Homes requirements.
Wiltshire Wildlife Trust	38	26	pg 42	A target for percentage of lifetime homes to be built could be accommodated into the SPD.	Agreed, the revised SPD requires 50% of dwellings on major residential developments to meet the Lifetime Homes requirements.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Swindon Civic Trust	108	25	pg 42	Object as it does not make provision for bicycle storage, this should be added to the first sentence.	This issue is covered by other existing Borough Council planning
Marc	Argent	185	2	pg 5	The hard realities of climate change require considerable tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.
Jo	Heaven	181	1	pg 5	SBC's targets on carbon emissions are too low, especially as there are now national targets being discussed of 20%.	The revised SPD now includes a zero/low energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Nick	Stenning	174	2	pg 5	Need to recognise that our ultimate aim should be towards "sustainability", in the strongest sense. Reducing carbon equivalent emissions and energy use by percentage points is of distinctly limited value if the scale of build is such that emissions still show a net increase.	Although the revised SPD does not include an explicit carbon emissions reduction target, significant carbon reduction will be achieved through the implementation of the SPD, which includes a renewable energy requirement and increased energy efficiency.
Annie	Whitford	175	2	pg 5	The hard realities of climate change require considerably tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina Adams		179	6	pg 5	The overarching carbon emission reduction target must be more ambitious given the latest scientific and economic findings about climate change, which have indicated that UK carbon emissions need to be reduced by 90% to stabilise at a 'safe' 2 Celsius average global temperature increase.	The revised SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
	East Swindon Development Group	82	1	pg 5	Object to the omission of a reference to the preparation of specific guidance on sustainability issues for the proposed Eastern Development Area (EDA). Seek the inclusion of text in the "Introduction" to 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 between the Borough Council, the ESDG and wider stakeholders.	The SPD includes general standards which will provide the minimum standard 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 sustainable building design and construction. It is not considered necessary to include a reference at this point.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
East Swindon Development Group	82	2	pg 5	Object to the omission of any reference to the costs to the development industry of the requirements being proposed. Such costs are potentially significant, especially in the short term and could adversely affect	The SPD has been revised to cover implementation issues. Financial implications have been assessed in two recently published studies for English Partnerships/Housing Corporation and the Environment Agency.
Wroughton Parish Council	51	1	pg 5	In reference to the third paragraph there is a comment that demolition of buildings generates vast quantities of waste. Swindon has consistently built then demolished buildings that have had less than 20 - 40 years life. Not convinced that Swindon Borough Council does recognise that more sustainable ways of operating buildings is necessary.	Swindon's ambition is to become the UK's most sustainable place and initiatives such as the production of this SPD will help achieve this. More sustainable building design and construction will make buildings last longer, reducing the need for demolition.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Simon	Bridewell	171	4	pg 5	<p>Additionally the SPD should refer to carbon emission reduction targets for waste and materials. Require higher level carbon emission targets for waste and minerals than the 'entry level only' targets required in the new Code.</p> <p>Include carbon emission targets for the whole</p>	<p>Although the revised SPD does not include an explicit carbon emissions reduction target, significant carbon reduction will be achieved through the implementation of the SPD, which includes a renewable energy requirement and increased energy efficiency.</p>
Helen	Parker-Drabbl	173	2	pg 5	<p>The hard realities of climate change require considerably tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.</p>	<p>The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network	166	4	pg 5	It is essential the estimated 35,000 new homes to be built in Swindon by 2026 are constructed to the highest available sustainability standards and the housing developments incorporate associated infrastructure and transport systems designed to minimise	The SPD focuses on ensuring future development is constructed to highest possible sustainability
Platform Design UK	176	2	pg 5	The hard realities of climate change require considerable tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	4	pg 5	It is essential the estimated 35,000 new homes to be built in Swindon by 2026 are constructed to the highest available sustainability standards and the housing developments incorporate associated infrastructure and transport systems designed to minimise	The SPD focuses on ensuring future development is constructed to highest possible sustainability
Ms Deborah	Joffe	154	2	pg 5	The hard realities of climate change require considerable tougher targets than are currently outlined in the SPD. Concerned to ensure that the document leads to an actual overall reduction in carbon emissions on today's levels. It is total emissions which create climate change not percentages. We are likely to need to be reducing emissions from today's levels at a far higher rate than the current SPD will enable. The overall absolute reduction in carbon in line with the actual demands of scientific predictions should be the guiding principle of the document.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	3	pg 5	Reduction in emissions will not be achieved without ensuring the estimated 35,000 new homes to be built in Swindon by 2026 are constructed to the highest available sustainability standards and that the housing developments incorporate associated infrastructure and transport systems designed to minimise carbon emissions.	The SPD focuses on ensuring future development is constructed to highest possible sustainability
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	2	pg 5	Since the Climate Change Action Plan was launched it has been recognised that emissions need to be cut by 90% by 2050 for there to be a reasonable chance of the average global temperature not rising by more than 2 Celsius.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	6	pg 5	The document should ensure that it leads to an actual overall reduction in carbon emissions. It is total emissions that create climate change not percentages. The overall purpose of the document should be 'to set specific measurable targets for developments, including targets for carbon emissions'.	The revised SPD has been strengthened by the requirement for 20% renewable energy an by its alignment to the Code for Sustainable Homes/BREEAM standard within which carbon reduction is implicit. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.
	Swindon Civic Trust	108	2	pg 5	Climate change is important, and most of the issues raised in the document apply to the whole of Europe and should be part of primary legislation, and not left to local authorities to implement as and when they see fit.	Whilst the Borough Council accept that tackling climate change is a global issue, it is also considered that a proactive local approach is crucial in tackling these issues. Emerging national planning guidance provides a justification for this approach.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Andy	Parsons	167	3	pg 5	Since the Climate Change Action Plan was launched it has been recognised that emissions need to be cut by 90% by 2050 for there to be a reasonable chance of the average global temperature not rising by more than 2 Celsius. This should be SBC's target for Carbon emission reductions. Since energy efficiency is a highly effective mechanism to deliver this, should be aiming for zero carbon energy provision in new build homes.	The implementation plan provides a timescale for zero carbon development by 2016 which is line with the draft South West Regional
	Swindon Climate Action Network	166	3	pg 5	Since the Climate Change Action Plan was launched it has been recognised that emissions need to be cut by 90% by 2050 for there to be a reasonable chance of the average global temperature not rising by more than 2 Celsius. This should be SBC's target for Carbon emission reductions. Since energy efficiency is a highly tractable mechanism to deliver this, should be aiming for zero carbon energy provision in new build homes.	The implementation plan provides a timescale for zero carbon development by 2016 which is line with the draft South West Regional

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Swindon Climate Action Network	166	2	pg 5	The hard realities of climate change require considerably tougher targets than are outlined in the SPD.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.
	Network Rail	158	1	pg 5	No objection provided the sustainability objectives are balanced against other objectives such as promoting appropriate sites for development.	The SPD must be viewed in context of all adopted planning guidance.
Adam	Vickers	178	2	pg 5	The hard realities of climate change require considerable tougher targets than are outlined in the SPD. The overall absolute reduction of carbon emissions towards zero carbon should be the guiding principle of the document. This is essential in the light of the recent report of the Intergovernmental Panel on Climate Change.	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Rex	Barnett	172	1	pg 52	Would like more information on the use of solar panels as they appear to give a poor return for the cost. Concerned not heard if their could be any health problems from wind turbines as we may have with overhead cables. Wind turbines make a blot on	The SPD provides a "Further Information" section in regard to renewable energy.
	Swindon Civic Trust	108	27	pg 52	It would be useful to give some indication as to how potential conflicts with "Site Value Principles" and housing densities are to be resolved. Would favour resolutions supporting the site layout principles	Objectives for solar passive design are a considerations, but need to be balanced with other issues such as density.

Darren	Cook	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
		182	1	pg 55	<p>A 15% glazing requirement for rooms on north, east and west elevations is excessive. In good design, rooms on north elevations will have less glazing and more insulation, they will be secondary rooms requiring less daylight than living rooms on the south elevation. Passive solar gain from a more glazed south elevation will be reduced if the colder north elevation has too much glazing. The SPD should be changed to state that glazing on the east and west elevations may be less than 15% and glazing on the north elevation should generally be less than 15% so that the emphasis on north walls is on insulation rather than glazing.</p>	<p>The SPD provides a general, level of guidance in respect of solar passive gain. It is not considered necessary to increase the level of detail. A further information source is</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Persimmon & Redrow	85	2	pg 6	Would argue that mandatory nature of the guidance is unlawful as it attempts to go beyond current Building Regulation requirements and indeed current Government thinking, thus what is perfectly permitted within Building Regulations may not receive planning permission.	The draft Climate Change supplement to PPS1 (Dec 2006) highlights in Para 30 that "Planning Authorities should be concerned with the environmental performance of new development." For new homes, the supplement also encourages standards to be based on the Code for Sustainable Homes. A framework for introducing sustainable design requirements through planning is
Persimmon & Redrow	85	1	pg 6	Believe that the guidance goes beyond what can be reasonably expected given the standards and accepted principles set out in other statutory documents and instruments. For example, the requirement for all homes to be BREEAM 'excellent' is contrary to that required in Building Regulations. It is premature pending publication of the Code for Sustainable Homes.	The revised SPD is in alignment with Government endorsed national standards (Code for Sustainable Homes/BREEAM). The draft Climate Change supplement to PPS1 (Dec 2006) encourages standards for new homes to be based on the Code for Sustainable Homes.
East Swindon Development Group	82	3	pg 6	Object to the omission of reference to relevant emerging higher-level policy, specifically the draft supplement to PPS1 and the emerging RSS.	The SPD has been revised to accord with emerging national planning guidance. A policy context is provided in Appendix 2. The South West Regional Spatial Strategy renewable energy requirements have been integrated into the SPD.

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
East Swindon Development Group	82	4	pg 6		Object to the omission of a reference in this section of the SPD to the adoption of a flexible approach in its application. The most suitable approach to achieving high standards of performance will vary from site to site, as well as over time. It is therefore important that a flexible approach is adopted in terms of developments meeting their obligations to deliver high standards. This essentially is the approach adopted in the Code for Sustainable Homes.	<p>The Council has adopted a flexible timescale to the implementation of the SPD. It is envisaged that the "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in implementation to put in place systems to maximise the impact of the guidance.</p> <p>The SPD includes an element of flexibility where reaching the "Swindon Standard" would be impractical or render the development unviable. This flexibility has been included as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry. In these cases, developers will need to enter into early discussions with the Council. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are impractical, the Council may commission an expert third party to verify such a claim.</p>
Gina Adams	179	14	pg 6		The purpose of the document should be set specific and measurable targets for sustainable developments, including carbon emission targets.	The SPD does set targets for sustainable development in line with national standards (Code for Sustainable Homes/BREEAM).

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon	157	1	pg 6	There is no mention of the Council's obligations to prevent crime and disorder under Section 17 of the Crime and Disorder Act 1998. Could this be included as an additional aim, and if not in this document, identified elsewhere in the planning process	It is considered that issue raised falls outside the scope of the SPD. Policy DS6 of the adopted Swindon Borough Local Plan requires that development proposals be designed to minimise opportunities for criminal
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	10	pg 6	One of the real challenges facing the Borough in its efforts to reduce its overall carbon emissions is the existing housing stock. As much as 84% of Swindon's homes were built before 1976. The SPD should require that developers or homeowners carry out a Home Energy Conservation survey as a requirement of the planning process for any alterations to their property. Planning permission should only be granted when energy efficiency works to a minimum standard have been carried out or are to be carried out at the same time as the alterations.	The Borough Council have adopted a phased approach to the implementation of the SPD. Initially the SPD will apply only to 'major' new development. 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

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Strategic Partnership Climate Change Action Plan Steering Group	165	11	pg 6	The current (inadequate) energy efficiency regulations for new homes were introduced in 1985. There has not been a single prosecution for non-compliance, yet 43% of new homes that have received a compliance certificate should have failed. Would like to see a commitment to enforcement contained in the SPD.	Compliance with the Code for Sustainable Homes/BREEAM standards will be ensured by the Building Research Establishment (BRE). The Code for Sustainable Homes requires assessment at the design stage and at
Swindon Civic Trust	108	5	pg 6	The Borough contains a substantial area of agricultural land. Its potential for producing bio-fuels needs	This issue falls outside the scope of the SPD.
Swindon Climate Action Network	166	5	pg 6	The document should ensure that it leads to an actual overall reduction in carbon emissions. It is total emissions that create climate change not percentages. Therefore strongly recommend that the first paragraph be replaced with: "The purpose of the document should be set specific and measurable targets for sustainable developments, including Carbon emission targets."	The SPD does not include a carbon emissions reduction target. However, such a reduction is implicit within the Code for Sustainable Homes and BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	6	pg 6	Sooner or later the debate will open on building wind-farms on the Borough's hilltops. Is this preferable to a new nuclear facility at Hinkley Point? The SPD should examine the wider potential within the Borough for the generation of renewable	Whilst the Borough Council accept that the issue of the location of renewable energy generation is a valid issue, the focus of the SPD is on sustainable building design of new development.	
Simon Bridewell	171	6	pg 6	The first sentence should be changed to: "set specific and measurable targets for sustainable developments, including carbon emission targets".	The revised SPD has been strengthened by the requirement for 20% renewable energy an by its alignment to the Code for Sustainable Homes/BREEAM standard within which carbon reduction is implicit. Future revisions of this guidance will consider setting an overall carbon reduction target.	
Ms Deborah Joffe	154	3	pg 6	Recommend strongly that the first sentence is replaced with: "The purpose of the document should be 'to set specific targets for sustainable developments, with priority to carbon emission reduction	The revised SPD has been strengthened by the requirement for 20% renewable energy an by its alignment to the Code for Sustainable Homes/BREEAM standard within which carbon reduction is implicit. Future revisions of this guidance will consider setting an overall carbon reduction target.	

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
David Wilson Homes (Southern)	97	5	pg 6	The Code for Sustainable Homes asks only that developers aim to achieve Level 3 of the Code. However, an Eco-Homes 'excellent' rating proposed in the SPD is on a par with Level 6 of the Code. This is significantly more difficult standard to achieve and DWH believes that it is doubtful whether applicants would be practically able to reach this standard at this time.	BREEAM's "Eco-homes Excellent" standard is roughly equivalent to the Code for Sustainable Homes Level 3/4,. The revised SPD requires that all new major residential development meet Level 3 of the Code. Level 3 has benefited from detailed cost studies (including one for English Partnerships/Housing Corporation), it represents a challenging but achievable basis for the "Swindon Standard".
Hannick Homes & Developments Ltd	84	5	pg 6	Firmly believe that implementation of the guidance note is premature pending more technical evidence and justification. Would not support adoption in its current form.	The revised SPD requires all new major development to meet Code for Sustainable Homes "Level3" and/or BREEAM "Excellent". Code Level 3 is the requirement for all publicly funded development and benefits from detailed cost studies. BREEAM "Excellent" is a well-known industry standard which has been around for a number of years. These standards therefore represent a challenging but achievable basis for the Swindon Standard.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
RIBA Wiltshire Branch	168	13	pg 6	There are a number of barriers to sustainable and low carbon development; legislation, planning restrictions, capital cost (with unrealistic payback periods), consumer awareness and the availability of an established market, with necessary skills and knowledge across the industry. Unfortunately the proposed SPD does not make any proposals that will tackle these barriers.	Wider work is being undertaken nationally, regionally and locally in respect of many of the issues raised. Solutions may well require a national policy lead. The SPD provides the basis for the "Swindon Standard" and Swindon Borough Council will be working constructively with stakeholders to ensure the impact of the guidance is maximised.
WM Morrison Supermarkets PLC	59	1	pg 6	Strongly object to the SPD as many of the requirements of the document fall outside the scope of issues covered by planning legislation, e.g. energy efficiency. Para 30 of PPS1 states that "Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building Regulations for energy efficiency."	The draft Climate Change supplement to PPS1 (Dec 2006) highlights in Para 30 that "Planning Authorities should be concerned with the environmental performance of new development." For new homes, the supplement also encourages standards to be based on the Code for Sustainable Homes. A framework for introducing sustainable design requirements through planning is

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	7	pg 6	Fear that the targets set in this document are not ambitious enough for Swindon to make an appropriate contribution to reducing carbon dioxide emissions.	The SPD has been drafted in accordance with national planning guidance and advice. The renewable energy target is in line with the recommendations of Swindon's Renewable Energy Task Group and the South West Regional Spatial Strategy. The SPD has been aligned with the Code for Sustainable Homes and the BREEAM standard. The requirement for Code Level 3 is already used by English Partnerships/Housing Corporation, and benefits from cost studies undertaken.
Hannick Homes & Developments Ltd	84	1	pg 6	Concerned that the document imposes requirements that are not set in Government legislation. Additionally its mandatory nature will lead to schemes that are perfectly acceptable in terms of current Building Regulations to be deemed unacceptable in relation to the guidance note and consequently at risk of being refused planning permission. This could be overcome by changing its mandatory nature to a voluntary code of conduct	The draft SPD has been revised to accord with emerging national planning guidance.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	Wroughton Parish Council	51	3	pg 7	Object to the lack of mention of Part 'L' Regulations which was introduced in April 2006.	Reference will be made to Part L of the Building Regulations.
	David Wilson Homes (Southern)	97	6	pg 7	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.	Reference will be made to Part L of the Building Regulations.
Gina Adams		179	13	pg 8	The SPD must be developed in consultation with the Swindon Transport Strategy, in order to make the most of opportunities for synergies and leverage. There is much that can be done during design of buildings that can help or hinder sustainable	Noted. The Council endeavours to explore all opportunities to facilitate sustainable development.
	Home Builders Federation	95	5	pg 8	The document follows the BREEAM/Eco-homes standard which is soon to be replaced by the Code for Sustainable Homes. No further standards should be imposed at the local	The draft SPD has been revised to accord with emerging national planning guidance, including the Code for Sustainable Homes, and the draft planning policy statement on climate change.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina	Adams	179	12	pg 8	The targets and requirements should be stronger, i.e. specific and enforceable requirements rather than advice and considerations. For each chapter the summary section should state that: "Development proposals must address the following issues."	The revised SPD has been strengthened through alignment to national standards (Code for Sustainable Homes/BREEAM) which have Government endorsement.
Adrian	Read	170	12	pg 8	Transport needs to be considered in the SPD, for example secure and convenient bicycle storage needs to be provided.	This issue is a valid consideration for new development but falls outside the scope of the SPD. Applications will be determined in light of all relevant guidance, the adopted Local Plan provides guidance on transport requirements of development.
Andy	Parsons	167	13	pg 8	Although the SPD does not deal directly with transport, wherever there is an opportunity to promote the ease of use of sustainable transport such as walking, cycling or using the bus, this should be encouraged. For instance, provision for secure bicycle storage.	This issue is a valid consideration for new development but falls outside the scope of the SPD. Applications will be determined in light of all relevant guidance, the adopted Local Plan provides guidance on transport requirements of development.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Jo	Heaven	181	4	pg 8	Old housing stock should also be included and not just council owned but private owned with additional grants for solar panel installation, grey water recycling and energy conservation.	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 larger developers best able to comply with the guidance. The scope of the guidance will be reviewed in the
Simon	Bridewell	171	12	pg 8	The SPD should make specific and enforceable requirements. The summary section of each chapter should be strengthened to: "Development proposals must address the following	The revised SPD has been strengthened through alignment to national standards (Code for Sustainable Homes/BREEAM) which have Government endorsement.
Jo	Heaven	181	3	pg 8	Ideas need to include solar power, wind power, gardens for vegetables, cycle paths, green roofing to save water and run-off and recycling points. Use of recycled materials in building such as recovering old bricks, tyre based paths and insulation should be encouraged. Maximum insulation and economic heating.	Renewable energy and re-use of materials in building are covered in the revised SPD.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Climate Action Network		166	14	pg 8	Although the SPD does not deal directly with transport, wherever there is an opportunity to promote the ease of use of sustainable transport such as walking, cycling or using the bus, this should be encouraged. For instance, provision for secure bicycle storage.	This issue is a valid consideration for new development but falls outside the scope of the SPD. Applications will be determined in light of all relevant guidance, the adopted Local Plan provides guidance on transport requirements of development.
Ms Deborah Joffe		154	12	pg 8	Need joined-up thinking with transport e.g. built-in cycle incentives, intelligent bus routes and services, and mixed use developments. Also the significance of grassed areas as carbon sequestrators should be considered.	This issue is a valid consideration for new development but falls outside the scope of the SPD. Applications will be determined in light of all relevant guidance, the adopted Local Plan provides guidance on transport requirements of development.
Danny Myers		184	3	pg 8	The benchmark is only of notional value and excellent is the only way that planners can feel confident that some genuine improvement has been made.	The "Swindon Standard" is based on the Code for Sustainable Homes/BREEAM standard which have Government endorsement. It is recognised that the requirements in the revised SPD represent a "step change" in construction standards from the present time.
Swindon Civic Trust		108	17	pg 9	The SPD should state that developers should provide some mitigation (possibly in the form of commuted payment) where meeting the standard is impractical or unviable.	Reference to commuted payments has been removed from the SPD. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are considered impractical, the Council may commission an expert third party to

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	14	pg 9	This section requires greater clarity regarding scope and responsibilities. It is not clear that if developers choose to go down the current Eco-Homes route, they will also be required to meet the 15% renewable energy requirement. The SPD needs to clarify the developers full responsibilities.	The draft SPD has been revised to accord with emerging national planning guidance, including the Code for Sustainable Homes. The renewable energy requirement is additional to the requirements of the Code or the BREEAM Standards.	
Jo Heaven	181	2	pg 9	Planners need to insist on developers not just concentrating their environmental measures on a few houses in the development while the majority have no measures in place to achieve their target. Instead preference should be given to developers who are installing environmental measures across all the housing stock.	Initially, the revised SPD will apply only 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	

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	108	15	pg 9	<p>How alternative proposals to Eco-homes will obtain accreditation is not stated? What will happen if a developer states on the planning application that they will use Eco-homes assessors, but then fail to deliver even a "pass" on the completed product? Will they then be required to deliver the Eco-homes assessment documentation to the local authority, and what is the sanction if they fail to comply and/or fail to gain a "pass"? The SPD should clarify how these issues will be managed and monitored.</p>	<p>The draft SPD has been revised in the light of emerging national planning guidance. All 'major' residential development will be required to meet the "Swindon Standard" which includes Level 3 of the Code for Sustainable Homes and all 'major' non residential development will be required to meet the BREEAM "Excellent" standard.</p>
Swindon Civic Trust	108	16	pg 9	<p>All new development needs to make some contribution, except some works to listed buildings. Exemption should be made for the modifications to the existing structures of listed buildings, where such work would destroy the "special interest".</p>	<p>Development proposals are determined in light of all relevant policy considerations, including that on development affecting listed</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
CPRE - North Wilts and Swindon	16	10	pg 9	Concerned with regard to enforceability, how will this be carried out? What powers will the Borough have to insist on compliance with its requirements?	Key elements of the "Swindon Standard" (Code for Sustainable Homes/BREEAM) will be assessed through the Building Research Establishment (BRE). The remaining requirements through Swindon Borough Council.
Home Builders Federation	95	6	pg 9	Question whether the sustainability checklist adds any value to the national Sustainable Code initiative. The HBF consider that any approach would be an onerous and time consuming requirement for developers to undertake.	The revised SPD is now aligned to the Code for Sustainable Homes.
Hannick Homes & Developments Ltd	84	2	pg 9	Page 9 makes the assertion that by including sustainability measures earlier in the process, the lower the costs will be. This is not backed up by DCLG thinking or research. All of the measures highlighted in the draft guidance will add cost to the	The earlier these measures are considered the better. Retrofitting is always more expensive.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
East Swindon Development Group	82	5	pg 9	Object to the omission of reference to wider considerations than practicality and viability in relation to preparing and assessing sustainability statements and determining the appropriateness of specific environmental performance measures. Add the following : Technical and Practical performance of potential measures required. Capital and operating costs Social/community impact; and The appropriateness of	The council considers that the references to viability and practicality sufficiently address the objectors concerns.
Hannick Homes & Developments Ltd	84	6	pg 9	The requirement to meet the Eco-Homes "Excellent" standard is extremely onerous on the development industry which cannot be imposed on a mandatory basis.	The draft SPD has been revised to accord with emerging national planning guidance, including the Code for Sustainable Homes, and requires all new 'major' residential development to meet Level 3 of the Code. Since April 2007 Level 3 has been required on development where English Partnerships and the Housing Corporation are involved.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Adrian	Read	170	11	pg 9	There is no mention of enforcing the SPD, some research suggests that current standards are not effectively implemented, so it would be a huge failure of the good work in this policy if construction companies can take short cuts in its implementation.	Implementation will be achieved through certification by the Building Research Establishment (BRE).
	Taylor Woodrow Developments Ltd	161	3	pg 9	Meeting the Eco-homes "Excellent" standard is extremely onerous on the development industry in terms of additional costs. The DCLG consultation document "Building a Greener Future" states that the new Code for Sustainable Homes is voluntary and not a requirement. It would appear that Swindon are going away from what is currently being proposed by the DCLG.	The key requirements of the revised SPD are based on Code for Sustainable Homes which has Government endorsement, and the BREEAM "Excellent" standard which is a well-known industry standard which has been around for a number of years. The 20% zero/low carbon energy requirement is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy. The required standards therefore represent a challenging but achievable basis for the "Swindon Standard". The draft supplement to PPS1 identifies that standards for residential development should be based on the Code for Sustainable Homes which the revised SPD does.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Helen	Parker-Drabbl	173	4	pg 9	Another major concern is enforceability. Whatever measures can be taken to insist and/or strongly encourage developers to accept the standards should be taken.	The requirements in the SPD are clear, as is the information required to demonstrate sustainability.
	Platform Design UK	176	4	pg 9	Another major concern is enforceability. What measures can be taken to insist and/or strongly encourage developers to accept the standards should be taken. The Council needs to take a lead in ensuring that developers are meeting the legislative standards in practice as well as in	The requirements in the SPD are clear, as is the information required to demonstrate sustainability.

				<i>Ref No: Obj. No. Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Gina Adams		179	8	pg 9	<p>The targets must deliver more than will be done anyway by emerging national codes and regulations. It should: Include carbon emission reduction targets for waste and materials and at a higher level than the 'entry-level only' targets required in the Code for Sustainable Homes. Include carbon emission targets for the whole lifecycle of a development, including construction and decommissioning, not just during the occupancy phase required by the Code for Sustainable Homes.</p> <p>Set minimum standards in areas where the Code does not, including</p>	<p>The SPD does not include a carbon emissions target. However, such a reduction is implicit within the Code for Sustainable Homes/BREEAM standard and, coupled with a 20% zero/low carbon energy target, will amount to a substantial reduction in carbon emissions. Further work will be undertaken on the exact carbon emission reduction required by the "Swindon Standard". Future revisions of this guidance will consider setting an overall carbon reduction target. Taking on board the lifecycle of development and ecology is a requirement of the revised SPD.</p>
	Persimmon & Redrow	85	4	pg 9	<p>Page 9 makes the assertion that by including sustainability measures earlier in the process, the lower the costs will be. This is not backed up by DCLG thinking or research. All of the measures highlighted in the draft guidance will add cost to the</p>	<p>The earlier these measures are considered the better. Retrofitting is always more expensive.</p>

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Annie	Whitford	175	4	pg 9	Another major concern is enforceability. What measures can be taken to insist and/or strongly encourage developers to accept the standards should be taken. The Council needs to take a lead in ensuring that developers are meeting the legislative standards in practice as well as in	The requirements in the SPD are clear, as is the information required to demonstrate sustainability.
Adrian	Read	170	13	pg 9	The general tone of the SPD is 'advisory', would like to see it written more as an 'enforceable compulsory requirement'.	The revised draft strengthens the requirements, through alignment to the Code for Sustainable Homes/BREEAM standard and assesment through the Building Research Establishment (BRE)
	RIBA Wiltshire Branch	168	18	pg 9	In order to develop and manage the policies proposed it is essential that the Borough Council has appropriate expertise and advice so that schemes can be realistically assessed and encouraged. In terms of the planning process it is proposed that an Architects Panel be instigated to provide the support to planning committee.	Agree that necessary expertise is required. The Council will consider the setting up of a technical group to help implement the guidance.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Taylor Woodrow Developments Ltd	161	2	pg 9	Page 9 makes the assertion that by including sustainability measures earlier in the process, the lower the costs will be. This is not backed up by DCLG thinking or research. All of the measures highlighted in the draft guidance will add cost to the	The earlier these measures are considered the better. Retrofitting is always more expensive.
The New Swindon Company	104	3	pg 9	There are a number of statements in the document that could be construed as policy, e.g. all new development must achieve Eco-Homes 'Excellent' standard, (pg 9). All statements that could be construed as policy and requiring action from developers should be clear. If such statements cannot be enforced, there seems little point in saying them.	The SPD expands on adopted Local Plan policy. It takes into account the recommendations of Swindon's Renewable Energy Task Group, to the draft South West Regional Spatial Strategy and national policy considerations. The "Swindon Standard" sets a clear standard for future development.
The New Swindon Company	104	2	pg 9	The requirement for a sustainability statement is welcome but there is no reference to any statutory requirement to provide such a document. It needs to be clear why it is required, whether it is needed for validation and whether any lapses can be a reason for refusal.	The Sustainability Statement is required to show how development proposed meets the SPD requirements. Guidance is included in the "Demonstrating Sustainability" section into the SPD.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
David Wilson Homes (Southern)	97	3	pg 9	It seems uncertain whether development control officers, in addition to processing an ever increasing weight of planning applications, would have the expertise or resources to devote to evaluating every application against a technical set of criteria and determining its score. It would be useful to have this clarified.	The Council has adopted a flexible timescale to the implementation of the SPD. The "Swindon Standard" will be required of new major development from 1st January 2008. This will allow the Council, the development industry and other organisations involved in the implementation of this guidance to put in place systems to maximise the impact of the guidance. The involvement of the Building Research Establishment (BRE) in the assessment process will aid implementation.
David Wilson Homes (Southern)	97	7	pg 9	Objects to the constant reference to the BREEAM/EcoHomes "excellent" standard, and that the SPD does not elaborate on what these standards actually involve. In addition there is no "signposting" within the document of how to find out about the required standard. This means the guide may be of limited use, for example to a resident wishing to submit a planning application who needs to understand what standards they should be aiming for.	The SPD has been revised with a simplified structure to provide a more user friendly document which clearly sets out the "Swindon Standard" and what is required to meet it. The revised SPD requires all new major development to meet Code for Sustainable Homes "Level 3" and/or BREEAM "Excellent". Code level 3 is the requirement for all new publicly funded development and benefits from detailed cost studies. BREEAM "Excellent" is a well-known industry standard which has been around for many years. These standards therefore represent a challenging but achievable basis for the "Swindon Standard".

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Adam	Vickers	178	4	pg 9	Another major concern is enforceability. What measures can be taken to insist and/or strongly encourage developers to accept the standards should be taken. The Council needs to take a lead in ensuring that developers are meeting the legislative standards in practice as well as in	The requirements in the SPD are clear, as is the information required to demonstrate sustainability.
	CPRE - North Wilts and Swindon	16	6	pg10	A commuted payment should be required, not may be acceptable.	The commuted payment element has been removed from the revised draft SPD. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are considered impractical, the Council may commission an expert third party to verify such a claim.
	CPRE - North Wilts and Swindon	16	5	pg10	This target is not ambitious enough, would seek a 20 - 25% target and a higher increment annually.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
CPRE	20	2	pg10	<p>All new development, including conversions should be Eco-homes 'Excellent' , not just major development. There should be no thresholds. Suggest amend the second paragraph to: "In addition, all development including affordable houses and conversions must incorporate on-site renewable energy and/or an efficient supply of heat, cooling and power to supply at least 20 - 25% of the buildings energy requirements." And in addition the following paragraph should be amended to: "The base target level will be raised at a rate which will lead to 100% or zero carbon emissions by 2030. Existing built development will be encouraged to convert to renewable energy systems."</p>	<p>The scope of applying the SPD to major development only will still capture 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 future. The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial Strategy.</p>

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Okus Area Residents Association	156	12	pg10	It may be that a development of 10 dwellings should have a lower figure than 15%, and one of 1,000 dwellings or more a higher base figure of e.g. 30%.	The 20% sustainable energy requirement initially will apply only to major new development. Future reviews may enable the scope of the guidance to be changed.
The New Swindon Company	104	5	pg10	The 1% year on year increase relies on the original 15% starting point being realistic and achievable in the first place. Increases should be realistic and not arbitrary, and whilst an increasingly challenging target is supported, it should be grounded in some assessment of its achievability.	The incremental increases have been removed from the revised draft SPD. The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
CPRE	20	3	pg11	There could be mention of air source heat pumps as well.	Agreed, a reference can be added.
CPRE - North Wilts and Swindon	16	7	pg18	The reference to using primary resources should be reflected in 2.5 Materials under M2.	Noted. The SPD has been revised to align with the requirements of the Code for Sustainable Homes and the BREEAM standard on materials.
Okus Area Residents Association	156	7	pg20	The River Ray on the SDA is little more than a ditch and regularly floods. The run off from planned development is likely to overwhelm this small outlet.	Consideration of flood risk at Wichelstowe was given due consideration in the determination of the outline planning application, in conjunction with the Environment Agency.

		<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
	CPRE - North Wilts and Swindon	16	9	pg33	The use of processed timber products for construction should be encouraged. This method of construction is already in use in many European countries.	Agree, the SPD has been revised to align with the Code for Sustainable Homes and the BREEAM standard which covers suitable use of
	CPRE - North Wilts and Swindon	16	4	pg9	Disagree with the final paragraph, why should the standard be impractical or unviable? This could be argued in far too many cases. If the Borough is seeking leadership and example in emissions reduction and energy conservation then no lower standards should be acceptable.	The SPD includes an element of flexibility as the Council recognises that sustainable design is at a relatively early stage and the Council wishes to work constructively with the development industry. In such cases developers will be expected to enter into early discussions with the Council. The process for demonstrating "unviability" is detailed in the SPD. Where the standards are considered impractical, the Council may commission an expert third party to verify such a claim.
Gina Adams		179	28	SA Para 6.3	Significant adverse effects of the SPD seem to amount to smelly bins and wind turbines and recycled materials looking ugly. These are hardly significant adverse effects, especially when considered next to the adverse effects of climate change! I think these should be downgraded to minor, or insignificant, in the appraisal.	This has been considered in the revised Sustainability Appraisal.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wroughton Parish Council	51	6	SA pg 25-26	Quite right when good design can reflect and improve a local character, shame Swindon Borough Council does not prioritise	The Borough Council values good design and provides advice within the Swindon Design Guide and the Shop Fronts Coding Guidance.
Wiltshire Wildlife Trust	38	22	SA pg 32 Para 5.33	It is true that some water-saving devices can be costly. In these cases the environmental costs of installation and construction/transportation of materials should also be taken into account. However, there are many such devices which are extremely cheap, and which can have large impacts on reducing water bills, if water meters are fitted. Water meters also raise awareness of water conservation, so are good means to changing people's habits. Businesses have an even greater contribution to water consumption, and so must do their part in reducing this, even at extra costs.	Agree, the SPD has been revised to align with the Code for Sustainable Homes and the BREEAM standard, of which both require consideration of water conservation.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	23	SA pg 33 Para 5.36	The target figure of 15% should ideally be higher.	The revised draft SPD now includes a zero/low carbon energy requirement of 20% (regulated emissions) for major development in Swindon. This figure is in line with the recommendations of Swindon's Renewable Energy Task Group and the draft South West Regional Spatial
Wiltshire Wildlife Trust	38	27	SA pg 34 Para 5.37	Whilst accept that there may be an increase in the amount of air pollution through the increase in waste recycling/reuse facilities, these effects can be alleviated through mitigation strategies relatively easily. Having such facilities in close proximity to developments helps to promote their use, which is a difficult thing to encourage.	This has been considered in the revised Sustainability Appraisal.
Wiltshire Wildlife Trust	38	35	SA pg 35 Para 5.43	The suggested different targets of renewable energy/ efficient sources for different sized schemes may make it easier for developers, but would perhaps be difficult in practice.	The revised SPD has one target figure for the provision of zero/low carbon on-site energy supply, and initially will only apply to major new

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wroughton Parish Council	51	7	SA pg 36 Para 5.51	Swindon Borough Council acknowledges a high fear of crime while allowing poor planning and development i.e. Park and Walcot new buildings with narrow unfit alleyways.	The issue raised falls outside the scope of the SPD. Policy DS6 of the adopted Swindon Borough Local Plan requires that development proposals be designed to minimise opportunities for criminal activity.
Wiltshire Wildlife Trust	38	36	SA pg 37 Para 5..54	The Considerate Constructor Scheme should be made a recommendation in the SPD, as it will facilitate reductions in	Agree, this has been included in the revised SPD.
Wiltshire Wildlife Trust	38	37	SA pg 39 Para 6.6	An additional monitoring target should be considered under this section: "Percentage reduction in overall energy use per	The monitoring indicators will be reviewed after the second public consultation period to ensure that the most relevant indicators are used for monitoring.
Wroughton Parish Council	51	5	SA pg5-6	Concern lies with the acceptable balance between cost and principle. All accepted reports of global warming require action now. Saying 'cost implications for developers may make some developments unviable', is just not acceptable.	Planning legislation is quite specific, a local planning authority cannot place undue burden on a developer, and must accord with national planning guidance. To do otherwise could run the risk of the SPD being unimplementable. The revised SPD therefore includes an element of flexibility where reaching the required standard would be impractical or render the development unviable. The process is detailed in the SPD.

	<i>Ref No:</i>	<i>Obj. No.</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Wiltshire Wildlife Trust	38	21	SA Table 5.1	Do not agree that 1 Energy has no clear link to 8. Social Exclusion and Poverty. The link between these areas is clear, due to the reduction in fuel poverty that can be made from energy efficiency measures, particularly in light of the Government's UK Fuel Poverty Strategy 2001 to eradicate fuel poverty for vulnerable households by 2010. The cell could be changed to objectives considered compatible.	The SA has been revised.