

Climate Change Supplementary Planning Document: Consultation Statement

1. Introduction

1.1. This statement is the 'Consultation Statement' for the Climate Change Supplementary Planning Document (SPD). It has been prepared as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the consultation undertaken and summarises the comments received during the consultation period, including details of how the issues raised have been dealt with in working towards a final SPD for adoption.

2. Town and Country Planning Regulations

2.1. The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.

- Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD.
- Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
- This statement is the 'Consultation Statement' for the SPD as required by Regulation 12(a). The document also sets out information about the consultation as required by Regulation 12(b). Following the consultation period, as the SPD progresses towards adoption, the 'Consultation Statement' will be expanded to recognise involvement by outside bodies and public participation during this consultation period.
- Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. This consultation statement sets out this requirement.
- Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:
 - Make the document available at the principal office and other places within the area that the Council considers appropriate;
 - Publish the document on the Council's website.

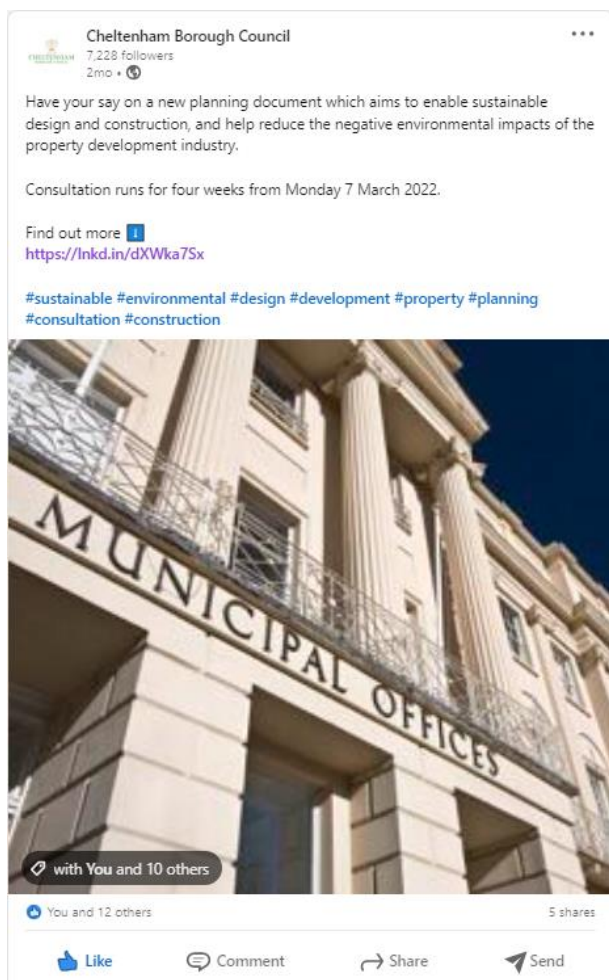
3. The Statement of Community Involvement (SCI)

3.1. This consultation statement has been prepared within the context of the Cheltenham SCI and reflects the 2012 Regulations, set out above. The relevant SCI's set out how the councils will consult and involve people in the preparation of local plans, including Supplementary Planning

Documents. Consultation on the draft SPD was carried out in line with the principles of the adopted SCI.

4. Draft SPD Consultation

- 4.1. Consultation on the draft SPD was carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD and its accompanying consultation was made available for inspection by the public for a four week period between Monday 7th March 2022 and midnight Monday 4th April 2022. A copy of the SPD and this consultation statement was made available to view at <https://haveyoursay.cheltenham.gov.uk/>
- 4.2. Hard copies of the document were available on request and will be available to view in local libraries.
- 4.3. The consultation was advertised on the Council's website and press release that can be viewed on the following link:
https://www.cheltenham.gov.uk/news/article/2653/new_planning_document_drives_positive_change_with_local_developers_to_tackle_the_climate_emergency
- 4.4. The release was picked up by the trade publication, The Planner, on their website:
<https://www.theplanner.co.uk/news/council-consults-on-climate-change-planning-document>
- 4.5. Details of the consultation were also published on the Council's social media accounts. Below is an example of the LinkedIn post:



4.6. All interested parties were invited to make comments, these included:

- Specific consultation bodies that the Council consider may have an interest in the Local Plan;
- general consultation bodies that the Council consider appropriate; and
- such residents or other persons carrying on business in the District which the Council consider appropriate to invite representations from.

4.7. Appendix 2 of the SCI provides a list of the specific and general consultation bodies.

5. Summary of responses

5.1. The following table summarises the main issues raised by the respondents and how those issues have been addressed in the final SPD.

Summary of key issues	Officer response	Summary of amendments made to SPD
The Council is too small to make any real difference to climate change.	Councils have a significant part to play in tackling climate change and should strive to set a strong example for others to follow suit. The benefits of responding to climate change are numerous.	None.
Restore Cheltenham-Honeybourne-Stratford railway.	Outside the scope of this SPD.	None.
Council tax reduction for the best performing properties with no VAT charged on carbon reducing products.	Outside the scope of this SPD.	None.
Restrict paving over grass/gardens and remove rules that prohibit homeowners from creating habitat spaces.	Outside the scope of this SPD.	None.
Include reference to the drainage hierarchy, whereby surface water discharges are managed sustainably avoiding connections into the foul or combined public sewer network.		Reference to the drainage hierarchy has been added to the Flooding page.
Where will the extra electricity will come from for heat pumps and electric cars?	The KPIs have been formulated by the London Transformation Initiative. Their analysis included future electricity demand predicted by the National Grid, resulting in ambitious but achievable KPIs.	None.
The document discourages use of wood burning stoves. I believe this is unwise and untenable because of the need for resilience in our energy systems.	Wood fuel will be considered on a case by case basis. The SPD does not want to encourage biomass heating for large developments, or where alternatives are possible due to air quality and sustainable supply issues.	None.
LETI not defined.		LETI acronym expanded.
Incorrect date on carbon budget graph.		Carbon budget graphs adjusted to show from 2022.
Energy Use Intensity (EUI) definition incorrect, no mention of period or area.		EUI definition clarified to include /m2/yr

Is EUI of 15-20 compatible with pandemic levels of ventilation?	The space heating demand is a good KPI to ensure efficient fabric design. It does not preclude people opening windows and ventilating more during occupation, although this KPI if measured may not be achieved in occupation if this was the case, the building has the potential to use very little energy for space heating while still maintaining excellent air quality.	None.
Recommended embodied carbon 350 kgCO2e/m2/yr is too high.	Embodied carbon figure an evidence based target based on the work of LETI. More work needs to be done on embodied carbon before introducing more stringent targets.	None
Include high winds 100+ mph like recent storms.		Reference to high winds added to one-pager.
No mention of sound insulation and multiple occupancy blocks.	Sound insulation is part of the building regulations and not repeated in this concise SPD.	None.
Can a clause be added, "planning should measure Biodiversity with a baseline of the site's most abundant state from the preceding 5 years."		The addition of a requirement to include the previous 5 years in ecological assessment has been added.
Advise to use hedging for biodiversity instead of wooden fences between plots, use wire fences while hedge establishes.		Possibility of hedges added to ecology page
Add link to the LEP Growth Hubs if businesses would like advice and assistance on net zero issues. https://www.thegrowthhub.biz/netzero Also include the link to the Active Building Centre https://www.activebuildingcentre.com/		Link to The Growth Hub added. The Active Building Centre not mentioned specifically but smart technology has been included on the one pagers and renewable energy page.
Whole life carbon includes manufacture and transportation of materials, ongoing maintenance of the chosen materials and	Recommendations that impact whole life carbon are included in the document but are not given specific targets.	None.

<p>technologies (heat pumps, photo voltaic panels etc) and the eventual decommissioning and recycling of components or whole buildings.</p> <p>Any development will place additional demands on local commercial, community and social infrastructure so these in turn will need to be expanded resulting in secondary carbon emissions.</p>	<p>Expanding the supply of referenced local infrastructure to meet the demands of new developments is outside of the scope of this SPD.</p>	
<p>Ultimately some measures will depend on effective council planning enforcement.</p>	<p>Fair point but outside the scope of this document itself</p>	<p>None.</p>
<p>Instead of questions, this needs to be set out as "demands".</p>	<p>Cannot demand this, it would be over and above policy.</p>	<p>None.</p>
<p>It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. Standards need to be universally understood and capable of being technically implemented.</p>	<p>Planning policy has an important role to play in the battle against climate change. The recent changes to the NPPF added 'climate change' in several places but is not progressive enough. The Council wants to see ambitious and forward thinking development as set out in this SPD.</p>	<p>None.</p>
<p>The context would be helpful to provide a bit of background context e.g. around CBC's intentions as a council</p>		<p>A Foreword has been added.</p>
<p>We would prefer this document to be more Cheltenham specific and to include local examples and illustrations.</p>		<p>Locally relevant case studies have been added.</p>
<p>It would be better if the audiences were made clearer.</p>		<p>The audience has been clarified on the introduction page.</p>

<p>We need to encourage re-use of existing structures wherever possible, especially if they are concrete heavy due to the embedded carbon.</p>		<p>Preference for re-use of buildings over new development has been made on the Site and Orientation page. A recommendation to prioritise brownfield over greenfield has been given on the site and orientation page.</p>
<p>The additional costs of developing strategic sites to the standards required by the SPD could easily result in them becoming unviable and contributing to a shortage in the supply of new housing.</p>	<p>Viability of a scheme can still be a factor in making a planning decision and the SPD does not override that, as it is national policy. Viable zero-carbon schemes, which meet affordable housing requirements, have been approved in Cheltenham.</p>	<p>None.</p>
<p>The SPD should not be adopted unless it is consistent with adopted policies in a Local Plan and it should be made clear that it is guidance, not policy.</p>		<p>Clarification on how this SPD relates to policies has been given in the opening pages.</p>
<p>The water consumption target of 105 l/p/d is beyond the tighter Building Regulations optional requirement of 110 l/p/d, as described in the PPG (ref: 56-014-20150327).</p>		<p>The building regulations requirement is 105 l/person/day for internal water use and 5 l/person/day for external water use (totalling 110 l/p/day). A clarification that this is internal water use has been included.</p>
<p>It would be good if the required level of provision sought by the SPD was aligned with current municipal waste management targets</p>		<p>Added specific waste reduction targets to intro on waste page.</p>
<p>To provide practical guidance for owners, the B&NES Sustainable Construction and Retrofitting Supplementary Planning Document (SPD) may be a helpful local reference.</p>		<p>Reference to BNES climate change SPD given on the references page.</p>
<p>Cheltenham Climate Change SDP should take account of the full range of LTP policy commitment and ensure that the matrix which Cheltenham local policies relate fully to the LTP and guidance within the SPD in terms of;</p>		<p>The policy reference matrix has been updated to reflect fully the LPT guidance including transport, flooding, ecology and biodiversity and waste.</p>

transport, flooding, ecology and biodiversity and waste.		
Given the significant number of design considerations and expectations, we would seek clarification on whether any transitional arrangements are to be put in place following its adoption.	Transitional arrangement are not recommended as we want to make an impact as soon as possible.	None.
Suggestions made to improve cycling text on the Transport page.		Requirement to meet LTN 1/201 standards included on Transport page. Reference to "Standards for Public Cycle Parking" added to Transport page. Major developments to also include features in minor developments list. Wording in checklist amended to include "irrespective of age or ability".
There is a small paragraph on page 19 on district heating which is not very encouraging and fails to recognise that there is another alternative to single dwelling/building heat pumps. This is shared loop ground source heat pump systems.		Clarification has now been included that communal heating using ambient distribution temperatures is acceptable.
Whilst there is a comment recommending early conversations with the Conservation Officer, the document needs to clearly state certain measures will not be suitable or acceptable for listed buildings/conservation areas.	Each case is assessed on its own merits having regard to the building. Heritage is an important material consideration that needs to be considered alongside the Climate Change SPD. The council also already has some information online about working with listed buildings and within conservation areas on schemes relating to energy efficiency and renewables: https://www.cheltenham.gov.uk/info/61/climate_and_sustainability/1689/energy_efficiency_renewables_and_our_built_cultural_heritage	None.

Whilst there is reference at the very end of the document (page 31 responding to our policies) it would be much more beneficial to have the details explained as to how the SPD links to other planning policies e.g. the Local Plan, JCS, and schedule out the details as to what sections are relevant. As a planning document it needs to sit alongside these documents and make it clear to applicants how it does so.		Clarification on how this SPD relates to policies has been given in the opening pages.
In the absence of policy-based justification, the Council should not be requiring new major development to exceed up-to-date and increasingly stringent national standards relating to greenhouse gas emissions.		None.
Suggested clarifications to the Ecology page (p24)		Pg 24 - recommendations incorporated.
Stop the trend of developers clearing land of all vegetation before applying for planning permission.		A requirement to include the previous 5 years in ecological assessments has been included on the ecology and biodiversity page.
Some design aspects are not Cheltenham-friendly and encourage poor design	Architects and developers should seek to optimise energy efficiency and high quality architecture, and the two need not be mutually exclusive. As evidenced in classic regency architecture which is simple, compact and highly regarded for its aesthetic.	None.
Preference for BNG on sites can limit the benefits that can be achieved at landscape scale off site.		Review of off-site nature capital enhanced on biodiversity and ecology page.
No mention of a retrofit designer, this is an evolving role but necessary for detailing of measures as unlikely that standard detailing can be used and the RC is unlikely to fulfil this design requirement.		The retrofit designer reference has been added to the one-pager.

<p>Development on derelict town centre sites should be prioritised over greenfield developments.</p>		<p>The preference for brownfield over greenfield has been added to the page on "Site and Orientation".</p>
<p>There is concern that the u-values specified in the SPD, along with the requirements for building orientation and large south-facing windows, would lead to overheating issues and the likely failure of Part O of the Building Regulations.</p>		<p>Good u-values should not lead to overheating if measures to reduce overheating risk are taken into account - these are already mentioned in the one-pagers, the dedicated page on overheating and various other pages ('Design and efficient building form' and 'Building fabric, detailing and materials'). Reference to the overheating risk assessment, as per the dedicated page on Overheating, has been added to the new-build one-page summaries.</p>
<p>The inclusion of a dedicated guidance theme for 'Waste' is strongly supported. However, the text throughout this theme would benefit from re-working to better align with existing well-established policy requirements and local guidance on waste minimisation matters</p>		<p>Within the bounds of the page we have aimed to accommodate them as far as possible (It should be noted that a separate waste SPD may be produced):</p> <ul style="list-style-type: none"> - reference to "other relevant waste streams" is now included: - reference to the "Waste Minimisation Statement" has been added. - Reference to Gloucestershire Core Waste Strategy and policy WCS2 has been added to the policy/chapter matrix. - Use of some suggested wording throughout the Waste page.
<p>A checklist is welcomed however it is not clear which developments this relates to e.g. major, minor, domestic, offices etc. Will CBC be requiring a flood risk assessment for a domestic extension for example?</p>		<p>Clarification on how this SPD relates to policies has been given in the opening pages.</p>

<p>We would prefer the checklist on page 30 to be set out as a set of planning statements or requirements (if not, why not?) rather than questions.</p>	<p>Cannot demand this, it would be over and above policy.</p>	<p>None.</p>
<p>New homes should use induction technology as the most efficient option for cooking and water heating.</p>		<p>Reference to efficient electric cooking appliances has been added to the one-pagers.</p>
<p>This section identifies JCS Policy SD3 ‘Sustainable Design and Construction’ as the key policy to which the SPD relates. However, the guidance contained in the SPD is not supported by this policy.</p> <p>Part 1 of Policy SD3 states that: ‘proposals (including changes to existing buildings) will be expected to achieve national standards’. The SPD expects proposals to exceed national standards.</p> <p>Part 2 of Policy SD3 states that: ‘All development will be expected to be adaptable to climate change’; however, the SPD expects new development to help tackle climate change, rather than adapt to it.</p>		<p>Clarification on how this SPD relates to policies has been given in the opening pages.</p>