

## Summary of Comments on the SPD Sustainable Design and Construction

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
<b>General</b>	
The full title 'Sustainable Design and Construction Resource Efficient Buildings' is unwieldy and the title of the Technical Appendix is missing the word 'Supplementary'.	Agreed. <b>Recommendation: Change title of SPD to 'Sustainable Design and Construction' and add 'Supplementary' to the Technical appendix title.</b>
<b>Oxfordshire County Council</b>	
Objective of encouraging sustainable construction is in line with County Council's priorities and strategic objectives.	Noted
Section on regional and local policies needs updating. Structure plan G6 is not a saved policy and therefore no longer relevant. Section on SE Plan refers to draft version, but this is now adopted.	Agreed <b>Recommendation: SPD Page 4, paragraph 2.6, remove references to County Structure Plan Policy G6</b>  <b>Recommendation: SPD Page 4, paragraph 2.7,</b> a) replace sub-title with 'The South East Plan' b) first sentence, replace 'Policy EN1' with 'Policy NRM11' c) second sentence, amend to read "New developments of more than 10 dwellings or 1000sqm of non residential floorspace should secure at least 10% of their energy from decentralised and renewable or low carbon sources." d) last sentence, replace with "The Plan also has a range of cross cutting policies on resource use, sustainable design, climate change and sustainable development."
Technical Appendix, Waste: SPD does not provide an accurate reflection of obligation to produce and implement a Site Waste Management Plan (SWMP). Greater level of detail is required for projects over £500,000.	Agreed <b>Recommendation: Technical Appendix, Page 13, paragraph 3.7 replace with ' It is mandatory to produce a (SWMP) if the cost of the construction project is over £300,000 and a greater level of detail is required for projects costing over £500,000. The requirement to prepare, update and implement a (SWMP) is set out in the Site Waste Management Plan Regulations 2008. Further information is available from DEFRA see Non-statutory guidance for site waste management plans April 2008'.</b>
Technical Appendix, Transport: Suggest adding that developments need to broadly correspond with County's Design Guide, in particular Manual for Streets.	Agreed <b>Recommendation: Technical Appendix, Page 21, paragraph 7.1, add 'Developments should take account of Oxfordshire County Council's Residential Roads Design Guide and in particular the Manual for Streets.'</b>
Technical Appendix, Ecology: Attached text with suggested changes.	Noted <b>Recommendations: Technical Appendix, Page 18, paragraph 5.8, replace first sentence with 'Habitats and species on the site and in the</b>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
	<p>surroundings should be assessed in an ecological report produced by a suitably qualified ecologist’.</p> <p>Paragraph 5.9, replace with the following ‘An ecological report should include</p> <ol style="list-style-type: none"> <li>1. A brief description of the site and its settings</li> <li>2. A brief description of the proposed development</li> <li>3. The relevant legislation and planning policy</li> <li>4. An outline of the method used to assess the site’s ecological value</li> <li>5. The results of any surveys carried out</li> <li>6. The potential impacts of the development</li> <li>7. Mitigation measures to avoid / minimise the impacts</li> <li>8. Compensation measures if impacts are unavoidable</li> <li>9. Enhancement measures to result in a net gain in biodiversity.</li> </ol> <p>Potential enhancement measures could be a scheme of native species planting (hedgerows, trees, wildflower meadows), the creation of ponds, the provision of bat boxes and space in roofs for bats and plants that produce food for birds at key times of the year. Reference should also be made to local Biodiversity Action Plans, local protection orders and plans to protect key biodiversity features during and after construction. Details of how the landscape and biodiversity features on the site will be maintained should also be included’.</p> <p>Paragraph 5.12 add the following bullet point</p> <ul style="list-style-type: none"> <li>• Sustainable Urban Drainage Systems (SUDS)</li> </ul> <p>Paragraph 5.13 replace the 3<sup>rd</sup> point with</p> <ol style="list-style-type: none"> <li>3. Where damage is unavoidable, compensate for the loss of features of nature conservation value to result in a net gain in biodiversity.</li> </ol>
<p>Technical Appendix, Safer Communities: Health, Safety and Well Being section is very well written. Pleased it considers planning’s links to community safety, sustainable community strategies and crime prevention.</p> <p>However, leisure and recreational facilities such as playgrounds should be accessible to all (including a range of disabilities and ages) – this should be built into the guidance and tie into County’s Equality and Diversity Strategy. Should consult with user groups over the most appropriate facilities.</p>	<p>Agreed</p> <p><b>Recommendation: Technical Appendix, Page 24, paragraph 8.10, add the following sentence ‘Leisure and recreational facilities such as playgrounds should be accessible to all (including a range of disabilities and ages) – this should be built into the guidance and tie into the equality and diversity strategies of Oxfordshire County Council and the Vale of White Horse District Council respectively. Developers should also consult with user groups over the most appropriate facilities.’</b></p>
<p><b>Drayton Parish Council:</b> Generally very much supported. Some is already in practice, some seems like wishful thinking. There will always be a trade off between cost of renewable/sustainable</p>	<p>The support is welcomed</p>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
considerations and providing housing at a reasonable cost.	
<b>TV Energy:</b> Appendix 4, Further references – British Photovoltaics Association no longer exists. Was subsumed into the Renewable Energy Association several years ago. The Renewable Energy Association has a very useful website ( <a href="http://www.r-e-a.net/">www.r-e-a.net/</a> )	Agreed <b>Recommendation Technical Appendix, Page 30, Appendix 3, Energy – delete ‘British Photovoltaics Association’ and replace with ‘Renewable Energy Association <a href="http://www.r-e-a.net/">www.r-e-a.net/</a>’</b>
<b>The Coal Authority:</b> Having reviewed the document, have no specific comments to make.	Noted.
<b>Kris Skalka, DipArch, RIBA</b> – It is always a problem when planning authorities try to implement policies in advance of central government and building regulations. Recommend authority does not exceed requirements of building regulations in its pursuit of sustainable construction.	Noted – Code for Sustainable Homes: the Council is not departing from the national timeline for implementation of the code  BREEAM (Building Research Establishment Environmental Assessment Method): Although there is no nationally agreed timeline for mandatory BREEAM standards there are precedents for local policies requiring BREEAM excellent and the Government stated in the 2008 budget that it intended all non domestic buildings to be zero carbon by 2019.  Renewable Energy – The Merton Rule is accepted in policy terms as being a valid method for securing on site renewables.
<b>Commission for Architecture and Built Environment (CABE):</b> General comments: Design guide should set standards for and inspire high quality design. Guidance should encourage consideration of local context. Guidance should be easy to understand and provide answers to frequently asked questions by planning applicants. Design guides are more successful if they are supported by other awareness raising activities. Lists helpful CABE guidance.	Noted - Comments relate to the design guide and a response has been made to these comments by CABE in Appendix 1.
<b>Anonymous</b> – Paragraph 1.1 – Why threshold? Is there any reason why these standards cannot be applied to smaller developments? Paragraph 2.5 – Is there any reason the Council could not jump straight to the 2010 revisions if the standards are known? The programmed staging could affect any buildings constructed in the intervening period. Paragraph 3.2.2 – Is there any scope to raise the threshold of acceptable development above code level 3 ahead of the 2013 or 2016 levels? Page 8 – can we enforce the code for developments of <10 dwellings? Concerned there will be a division between smaller developments of low efficiency housing while other development meets modern standards.	Noted – The reason for the threshold is simply to ensure that the council can properly cope with assessing planning applications for compliance with the policies in this SPD.  The council has chosen not to depart from the nationally agreed timeline for the implementation of code standards. We feel that meeting these standards will be challenging enough and further tightening these standards could affect house building in the Vale. The council has however chosen to require a minimum standard for renewable energy on commercial and residential buildings.
<b>South East England Partnership Board</b>	
Policy context – please refer to the Climate Change Act, the Code for Sustainable Homes, and the Government’s definition of zero carbon homes.	Agreed <b>Recommendation: SPD Page 3, paragraph 2.2, add</b>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
Should also refer to policy CC4 of the SE Plan (Sustainable Design).	<p><b>'Climate Change Act 2008 - The UK has passed legislation which introduced the world's first long term legally binding framework to tackle the dangers of climate change. Key provisions within the act include legal binding emissions reduction targets, carbon budgeting, emissions trading and adapting to climate change.'</b></p> <p><b>Page 6, paragraph 3.6, replace last sentence with 'The Government intends the Code to be a single national standard for England with a timeline for phased mandatory implementation. In addition the Government has recently consulted on the definition of zero carbon homes to give additional clarity to the 2016 target which the Government is still committed to.'</b></p>
Recommend expanding section on residential buildings to ensure consistency in advice across the documents.	Noted <b>Recommendation: No change</b>
As levels of the code get higher developers will need on site renewables to comply with regulatory standards. Therefore demanding 10% of energy from low carbon sources will become obsolete once code levels 4 and 5 are required. Recommend SPD is aligned with changes nationally, as afforded by Local Plan policy wording, to help provide clarity and consistency. (See section 3.1 of SE England Partnership Board Climate Change Guide for more info). Para 3.9 – Improvements in water efficiency will be enforced by gradual strengthening of building regulations. This will not be voluntary and therefore enforced by regulation.	Noted – The Council considers that the wording to the policy relating to renewable energy provides sufficient flexibility in the intervening period before higher code requirements demand more than 10% renewables. <b>Recommendation: No change</b>
<b>Dr PA Cawse</b>	
A valuable and essential supplement. The diagram on page 8 would be better placed on page 2 following the introduction.	Noted – The Council may however remove the diagram from the final version.
Page 4, Para 2.5 – Part 1 of the building regs will be subject to reviews in 2010, 2013 and 2016. For major housing development that involves phasing over 6-7 years, it should be stated whether they will require re-assessment at each phase. Application of the Code for Sustainable Homes Compliance should also be clarified in box 3.2.2 for the phased scenario.	Agreed <b>Recommendation: SPD Page 7, after para 3.9, box 3.2.2 has information about 'The Council's Required Standard for Residential Developments' with sub heading 'Code for Sustainable Homes Compliance' and associated sub paragraph. To the end of this sub paragraph add the following sentence 'Where phasing occurs on large developments a pre- assessment will be required for each phase to ensure dwellings built are compliant with the relevant level of the code as required in this SPD.'</b>
<b>Faringdon Town Council</b>	
Technical appendix, page 3 'Air Tightness' – pressure testing for air tightness is a new requirement – is this now set up? So far it has not appeared in any of our planning applications.	Noted – Pressure testing has been a building regulations requirement since 2000 and has been recently revised to take account to the requirements of the European Directive on the Energy Performance of Buildings

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
Technical appendix, page 4 'Ventilation' – further information would be appreciated – useful for the Corn Exchange.	Noted
Technical appendix, Page 23 Parking is now reduced!	Noted – Parking provision in any event has to comply with the requirements of the Highway Authority.
Technical appendix, Page 24-25 Will this prevent the relatively useless gardens as at the new housing at the dairy site in Grove?	Noted
Technical appendix, appendix 2 – Useful checklist but it needs to include all requirements as the owner will need this information for Hips.	Noted – The checklist has been designed for use by developers. The council will look into producing a separate one for householders.
Page 7 of SPD, box 3.2.2. - An application for more than 10 dwellings, will the standards achieved be made public and included in information given to buyers? Why should fewer than 10 not be assessed? Surely it should be made mandatory for all new buildings?	Noted – It is already a mandatory requirement to display a code for sustainable homes certificate on all new build dwellings.  The reason for the threshold is simply to ensure that the council can properly cope with assessing planning applications for compliance with the policies in this SPD.
<p><b>Persimmon Homes (Represented by Pegasus Planning Group):</b> Objective of achieving more sustainable construction is supported. SPD amplifies policies in Local Plan but should be more up to date taking into account more recent guidance. Para 2.7 should include reference to the emerging policies from the Draft RSS for the SE, particularly policies CC1-4 from the proposed changes.</p> <p>There should be no local departure from the nationally agreed standards and timetable (allow for flexibility). Attached is a report addressing the practical difficulties of the early introduction of the Code for Sustainable Homes. There are already technical, viability, and 'supply chain' problems with achieving the national timetable. Changes to building regs in 2010, 2013 and 2016 will provide opportunity to adjust policy in light of experiences. The policy framework will need to be capable of dealing with changing circumstances. Therefore do not support box 3.2.2. As yet no volume house builder has successfully built developments higher than code level 4. Achieving code level 5 will significantly increase costs and community energy ceases to be economical. Prices will be higher for smaller schemes so it is a concern that the Council's policy only applies to schemes of more than 10 dwellings. A flexible approach is required. There is no evidence of new home buyers being prepared to pay extra for energy efficient measures and actually shy away from anything out the ordinary. Higher code requirements have implications for densities as more space will be required for bins and bicycles. Attached briefing note sets out issues of for code level 5 and 6 which present technical problems.</p>	<p>Noted – During the drafting of the SPD and Technical Appendix The South East Plan was still in draft.</p> <p><b>Recommendation: See changes proposed to be made in response to Oxfordshire County Council's representations relating to SPD Page 4, paragraph 2.7, see above.</b></p> <p>Noted – The council will review the policies in this SPD every two years to ensure the SPD takes account of changing circumstances. <b>Recommendation: No change</b></p>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
Therefore flexible approach is needed.	
<b>Pegasus Planning Group</b>	
SPD is detaching itself from current building regulations like Code for Sustainable Homes. Dangerous because as technology and policy progresses, SPD could be left behind or stating wrong information if not updated. Will the SPD be reviewed annually to ensure it complies with government guidance and building regulations?	<p>Noted – The council considers that by linking the SPD to nationally agreed standards and assessment methods that it will avoid becoming outdated as technology progresses.</p> <p><b>Recommendation: SPD, page 1, paragraph 1.6, add the following sentence “Both the SPD and the Technical Appendix will be kept under review to ensure that any mandatory changes to national standards and regulations will be reflected in the guidance.”</b></p>
Paragraph 1.1 – why is the SPD only relevant to 1000m2 or developments of 10 or more dwellings? This is not stated in BREEAM or Code for Sustainable Homes.	Noted – The Council is concerned it may not have the resources to assess applications if the policy was applied to every new commercial and residential building.
Paragraph 3.12 – Current guidance is that non-residential buildings must adhere to BREEAM ‘very good’ standard. Setting the benchmark at ‘excellent’ is too high. The Council will follow the Code for Sustainable Homes timeline and assessment, is there any need for this lengthy SPD? Why not just make reference to Code for Sustainable Homes?	<p>Noted – Climate Change is strategic objective of the Council and it considers that any building in the Vale should be of the highest possible standard incorporating the best design and technology available. The renewable energy requirements are additional to Code or BREEAM (Building Research Establishment Environmental Assessment Method) requirements. Issues of viability are covered on Pages 6 and 7 in boxes 3.1.2 and 3.2.2 by the following sentence ‘Applications for developments where it is claimed that such a requirement would be nonviable should be supported by a development appraisal which substantiates why this is the case’.</p> <p><b>Recommendation: No Change</b></p>
<p><b>Robert Fyfe:</b> Consideration should be given to permitting solar panels and PV panels on grade II listed buildings, even if this is thought ugly and intrusive.</p> <p>Didcot power station currently dumps a huge amount of heat into the atmosphere, enough to heat most of the homes in Didcot, Abingdon and Oxford. NPower only want to generate electricity, which they do well. Perhaps a new local organisation could be formed to take surplus heat from the power station, distribute it and sell it to households. Gas is set to become rare and expensive so this waste heat is a potentially invaluable resource to the future.</p> <p>Charge points for electric vehicles should be provided at car parks, restaurants, offices etc.</p>	<p>Noted – This would run counter to the requirements of the Residential Design Guide</p> <p>Noted – Use of low grade waste heat from Didcot A and B for district heating has been investigated in the past in conjunction with the expansion of Didcot, however recent proposals have been ruled out on cost grounds. New uses for waste heat or alternative technologies may of course change this situation.</p> <p>Noted – This is already covered on Page 22 paragraph 7.15</p>
<p><b>Natural England:</b> Support emphasis on conservation, enhancement and creation of habitats when planning development. Natural England promotes Green Infrastructure which should be planned and delivered from earliest phases of planning.</p>	The support is welcomed.
<b>Environment Agency</b>	
Support concept of the document which is well written, clear and comprehensive.	The support is welcomed.

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
<p>Page 3 refers to PPG25 but should refer to the more recent PPS25.</p> <p>Support requirement for BREEAM (Building Research Establishment Environmental Assessment Method) and Code for Sustainable Homes standards on Pages 5-8. These should also be stated in policies contained in the Council's Core Strategy.</p>	<p>Agreed <b>Recommendation: Page 3, paragraph 2.2, replace PPG 25 with 'PPS 25'</b></p> <p>Noted</p>
<p>Pages 9-11, support advice given on reducing water demand and using water more efficiently.</p>	<p>Support is welcomed.</p>
<p>Page 11, para 2.23 – would be helpful to explain that our Flood Zones only consider fluvial flood risk.</p> <p>Page 11, para 2.24 – recommend this paragraph is changed to acknowledge that PPS25 requires planning authorities to take into account flooding from other sources. These should be assessed in Strategic Flood Risk Assessment. Should apply the sequential approach for all sources of flooding and require Flood Risk Assessment for development affected by sources such as groundwater and surface water. Should also mention that the Core Strategy and other DPDs will provide local policy on flooding, which will replace the Local Plan.</p> <p>Page 18, para 5.6 refers to policies in Local Plan. Would be helpful to mention that these policies will be replaced by the Core Strategy.</p>	<p>Agreed <b>Recommendation: Technical Appendix Page 11, paragraph 2.23, change 1<sup>st</sup> sentence to 'The Environment Agency only considers fluvial flood risk (from rivers).'</b></p> <p>Agreed <b>Recommendation: Technical Appendix Page 11, paragraph 2.24, amend paragraph to read "PPS25 requires planning authorities to take into account flooding from other sources. These should be assessed in Strategic Flood Risk Assessments. Authorities should apply the sequential approach for all sources of flooding and require a Flood Risk Assessment for development affected by sources such as groundwater and surface water."</b></p> <p>Noted <b>Recommendation: Technical Appendix Page 18, section 5.6, amend first sentence to read "Chapter 7 of the Vale of White Horse Local Plan and the emerging LDF Core Strategy include a range of policies relating to nature conservation."</b></p>
<p>Page 20, para 6.4 – would be helpful to mention in an additional bullet point that Sustainable Drainage Systems (SUDS) can have benefits for protecting water quality from contaminated surface water run-off, and that pollution interceptors can be incorporated in SUDS where appropriate.</p>	<p>Agreed <b>Recommendation: Technical Appendix Page 20, paragraph 6.4, insert additional bullet point.</b></p> <ul style="list-style-type: none"> <li>• <b>'Sustainable Drainage Systems can have benefits for protecting water quality from contaminated surface water run-off, and that pollution interceptors can be incorporated in SUDS where appropriate'.</b></li> </ul>
<p>Appendix 3: Suggest including 2 further references – Adapting to Climate Change: A Checklist for Development (Nov 2005) (Three Regions Climate Change Group (TRCCG)) and Adapting to Climate Change: A Case Study companion to the checklist for development (March 2007), TRCCG.</p>	<p>Agreed <b>Recommendation: Technical Appendix Page 34 Add a further section</b></p> <p><b>'9.0 Climate Change Adaptation</b></p> <p><b>Website References</b></p> <ol style="list-style-type: none"> <li><b>1. UK Climate Impacts Programme – <a href="http://www.ukcip.org.uk">www.ukcip.org.uk</a></b></li> <li><b>2. Climate South East – <a href="http://www.climatesoutheast.org.uk">www.climatesoutheast.org.uk</a></b></li> </ol>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
	<p><b>Further Reading</b></p> <ol style="list-style-type: none"> <li><b>1. Adapting to Climate Change: A Checklist for Development (Nov 2005) (Three Regions Climate Change Group (TRCCG)</b></li> <li><b>2. Adapting to Climate Change: A Case Study companion to the checklist for development (March 2007), South East Climate Change Partnership.'</b></li> </ol>
<b>Persimmon Homes Wessex</b>	
<p>Concerned with purpose of document. Contents of document and Technical Appendix do not accord with aims set out in paragraphs 1.1 and 1.2 (to guide planners, developers, architects...) but document is mainly description of policies. Council will consider planning applications in regard to the standards set out in the SPD – very few standards are set out in the document. It is too general.</p> <p>Document must be clear and relate to Local Plan policies. These are not found in the appendix as stated in paragraph 1.3. There is limited cross referencing in the document to Local Plan policies. There has been no consultation or reference in the document to an evidence base for this SPD. Therefore it may not be sound.</p>	<p>Noted</p> <p><b>Recommendation: SPD Page 1, paragraph 1.3, amend last sentence to read “A list of the most relevant policies that relate to the SPD can be found in section 2 on page 3 of this document.”</b></p>
<p>Concern over timing of document in relation to recent government consultation on the definition of zero carbon and emerging policy which will offer developers more flexibility in terms of energy. Should not adopt SPD until revised government policy and timetable is finalised. This is partially recognised in paragraph 1.35 of Technical Appendix.</p>	<p>Noted. The Council opted to link this SPD to pre existing standards to avoid such problems.</p> <p><b>Recommendation: No change.</b></p>
<p>Planning Policy Guidance does not need to repeat guidance which is adequately dealt with elsewhere (e.g. building regulations).</p> <p>Object to planning documents which seek to change other guidance, as in paragraph 1.14 of Technical Appendix which says consideration should be given to exceeding building regulations.</p>	<p>Noted</p> <p><b>Recommendation: No change</b></p>
<p>SPD encourages local sourcing but this may not be economical for volume house builders.</p>	<p>Noted</p>
<p>SPD should recognise that development should be subject to a viability test to assess whether or not it is feasible to meet guidelines set out in the document.</p>	<p>Noted. Issues of viability are covered in boxes 3.1.2 and 3.2.2 by the following sentence 'Applications for developments where it is claimed that such a requirement would be non viable should be supported by a development appraisal which substantiates why this is the case.'</p> <p><b>Recommendation: No change.</b></p>
<p>There is considerable overlap with Residential Design Guide. Need for more cross referencing.</p>	<p>Noted</p> <p><b>Recommendation: Technical Appendix page 1, add to the end of the 1<sup>st</sup> paragraph 'This guidance should be read in conjunction with the council's Residential Design Guide'.</b></p>
<p>Section 7.6 regarding public transport omits the</p>	<p>Noted</p>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
<p>need to liaise with public transport operators.</p> <p>Concerned about the design implications of footpaths, cycle paths and roads running alongside each other which takes up considerable space.</p>	<p><b>Recommendation: Technical Appendix page 21, paragraph 7.6, amend to read “The first step under this section is to liaise with public transport officers at the relevant local authority and public transport operators.”</b></p> <p>Noted <b>Recommendation: No change</b></p>
<p>Paragraph 8.15 – Crime reduction can be secured without using SBD Scheme, it is more a question of good design and appropriate liaison with Police Architectural Liaison officers.</p>	<p>Noted <b>Recommendation: No change</b></p>
<b>West Waddy ADP</b>	
<p>In principle support proposals as they relate to nationally agreed sustainability assessment schemes such as BREEAM (Building Research Establishment Environmental Assessment Method) and Code for Sustainable Homes.</p>	<p>The support is welcomed</p>
<p>Main concern is lack of co-ordination between this SPD (encourages modern construction methods and technology) and the Residential Design Guide (encourages traditional design).</p>	<p>Noted</p>
<p>Boxes 3.1.2 and 3.2.2. – Why not make post completion compliance the subject of a planning condition? i.e. if development does not meet standard, condition cannot be discharged.</p>	<p>Agreed <b>Recommendation: SPD, page 5, after para 3.4, box 3.1.2 has information about ‘The Council’s Required Standard for Commercial Developments’, and under sub-heading, ‘BREEAM Compliance’ there is a sub- paragraph with last sentence commencing “If a building...” and also page 7, after para 3.9, box 3.2.2 has information about ‘The Council’s Required Standard for Residential Developments’, and under sub-heading ‘Code for Sustainable Homes Compliance’ there is a sub- paragraph with last sentence commencing “If a building...” In both instances amend the last sentence to read “If a building fails to meet the post construction validation <u>the planning condition cannot be discharged and</u> the Council may require the developer or occupier to submit full design stage certification for any future proposed development.”</b></p>
<p>Technical Appendix: Paragraph 4.9 and 4.10 and 9.4 bullet 3 – contradiction between use of lightweight framed and/or prefabricated design solutions and the use of high mass construction for thermal efficiency.</p>	<p>Noted – The guidance points out that any sustainable design solution should be appropriate to the situation. It does not advocate light weight construction methods in every case.</p>
<p>Appendix 2: Recommend using sub-heading ‘Mandatory Requirements’ after ‘Assessing the Sustainability of the Development’ with a further sub-heading ‘Advisory Requirements’ before ‘Energy’. This makes it clearer to applicants what they must do as a minimum.</p>	<p>Agreed <b>Recommendation: Technical Appendix, Page 27, Appendix 2, after the sub-heading ‘Assessing the Sustainability of the Development’ insert a sub heading ‘Mandatory Requirements’ with a further sub heading ‘ Advisory Requirements checklist’ before the sub-heading ‘Energy’.</b></p>

Sustainable Design and Construction - Summary of Comments	
Comment	Officer Response
Appendix 3: Further References – The Vale must give a reference to the Building Research Establishment directory of approved Code/BREEAM (Building Research Establishment Environmental Assessment Method) assessors. This should come first.	Agreed <b>Recommendation: Technical Appendix, Page 30, Appendix 3, Under 1<sup>st</sup> reference to ‘BREEAM’ add “BREEAM – for a list of all BREEAM assessors <a href="http://www.greenbooklive.com/page.jsp?id=161">http://www.greenbooklive.com/page.jsp?id=161</a>”</b>