

CONSULTATION STATEMENT

CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT

Prepared under Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

1. Purpose and Background

- 1.1. This Consultation Statement has been prepared in line with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that, before a council adopts a Supplementary Planning Document (SPD), it must produce a statement setting out:
 - i. the persons the local planning authority consulted when preparing the supplementary planning document;
 - ii. a summary of the main issues raised by those persons; and
 - iii. how those issues have been addressed in the supplementary planning document.

- 1.2. The Planning and Compulsory Purchase Act 2004 sets out the requirements for preparing Local Development Documents as part of the new planning system. This enables SPDs to be prepared to expand upon existing planning policy. The Climate Change SPD has been prepared to build upon and provide more detailed guidance for the application of Policies SP7 'Climate Change and Transport', CC1 'Renewable Energy', CC2 'Sustainable Travel', and CC3 'Parking Provision' of the Core Strategy 2009. It has also been prepared so that when Policy PS1 'Responding to the Climate Emergency' of the emerging Local Plan comes into force upon its adoption, although it will need to be updated with relevant references and necessary changes as the underlying policy framework may change, the core principles and guidance on implementation remain the same.

1.3. The SPD covers the following key topics:

- Energy
- Transport
- Materials, Construction and Waste
- Green Infrastructure
- Water
- Space & Place Design

1.4. The SPD does not create new policy but provides detailed guidance on what developers need to do to meet the requirements of policies within the Development Plan for Spelthorne, particularly in terms of leading the way in high quality sustainable development that minimizes the adverse impacts of climate change.

1.5. The SPD will be a material consideration in the determination of planning applications alongside Policies SP7 'Climate Change and Transport', CC1 'Renewable Energy', CC2 'Sustainable Travel', and CC3 'Parking Provision' of the Core Strategy 2009.

1.6. The document was prepared by David Locke Associates with consultation from Spelthorne Borough Council Officers, which helped to inform the SPD. The SPD will be adopted by the Council.

2. Formal Consultation on the Climate Change SPD

1.7. Formal public consultation on the draft SPD was undertaken for four weeks from 18 September 2023 to 16 October 2023. Several methods, including social media posts and a press release, were used to inform stakeholders about the consultation. Responses could be submitted as follows:

- Website: the SPD was published on the Council’s website at: <https://spelthorne.inconsult.uk/CCSPD/>
- Hard copies of the SPD were available:
 - At Spelthorne Borough Council’s offices, Knowle Green, Staines-upon-Thames, TW18 1XB during normal office hours
 - At Ashford Library, Shepperton Library, Staines Library, Stanwell Library and Sunbury Library
 - If consultees did not have online access and needed a paper copy of the questionnaire, there was the option to email planning.policy@spelthorne.gov.uk or call Customer Services on 01784 451499 to be transferred to the Strategic Planning team.

3. Responses and modifications to the SPD

3.1 The Council received representations from twenty-nine individuals, including residents, public bodies, and neighbouring authorities. Representations covered a range of issues including transport, formatting of the document, additional guidance to be referenced. The report to Council includes a detailed analysis of the representations received and recommendations about how they were considered to inform the changes made to the SPD.

3.2 Table 1, in Appendix 1, gives a full summary of responses with Officer’s responses and recommendations. All of the proposed amendments to the Climate Change SPD, as set out in Table 1, were approved and the SPD was modified accordingly.

3.3 Following the consultation, responses and recommendations were presented to Spelthorne Borough Council Members, at the Environment and Sustainability Committee, and modifications to the document have been made accordingly.

4. Conclusion

- 4.1 The production of the Climate Change SPD has involved consultation as outlined above, which has directly influenced refinement of the document. The process has complied with the relevant Government Regulations.
- 4.2 If there are any questions on this Consultation Statement, please contact the Strategic Planning Team on 01784451499 or e-mail – planning.policy@spelthorne.gov.uk

Appendix 1. Officer Response Table

Table 1. Climate SPD Consultation – Officer Responses

Question 1: Any comments on the SPD as a whole?			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that citizens should not have to include climate mitigation in their building plans		This is a supplementary planning document, not planning policy. This document is a guide to those applying for planning permission, providing practical guidance on the implementation of the relevant policies in the Local Plan. Planning applications are considered against the Plan as a whole and decisions based on an applications conformity with the policies in the Plan in the round. The measures set out in the SPD will form part of these considerations, but not be considered alone.	N/A
Individual comments on a lack of how existing infrastructure should be changed to achieve best practice		This document largely focuses on future planning in the borough, rather than existing infrastructure although householder extensions will offer opportunity for retrofitting of climate change measures.	N/A
Concerns surrounding transport and the lack of transport infrastructure	Promotion of clean, green transport does not align with current council	As a two-tier authority, transport in the borough is dealt with by the Surrey County Council highways team. This SPD deals with new development in the borough, extensions and promotes the measures discussed in the checklists.	N/A

	<p>policies particularly cycling</p> <p>There should be a borough wide default 20mph zone and integration of public transport with the TFL network</p> <p>Anti-car aspects are not related to Spelthorne - people need cars</p> <p>Prioritise public transport</p> <p>Comments are minimal on active transport throughout the SPD</p> <p>Advocate for developers to consider location of proposed development in relation to existing transport hubs and network</p>		
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	More parking spaces on and off street		
Air quality issues around the Eco park		Not covered as part of this SPD.	N/A
No clear evidence on where the stats are from		The document is referenced throughout, which can be found in the footnotes. The evidence comes from both government and other reliable sources. Additional resources and evidence of information can be found throughout the document, for example in section 2.26, page 20. This signposts to the LETI Design Guide and the RIBA Climate Challenge 2030, both informed by architects and built environment professionals.	N/A
No mention of hydrological considerations		This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	N/A
Home improvements might be too expensive which may deter planning applications		Noted. It is understood that some additional measure may add costs for smaller developments, but this is not always the case, especially for major applications. Additionally, some measures may help reduce costs elsewhere e.g. renewables, better fabric etc. can reduce energy use. The measures are also not mandatory, it is up to the applicant to decide on what they choose to implement.	N/A
Individual comments that Net Zero is biased		Noted.	N/A
Individual comments that climate change has happened many times before so this won't help. Human population should be controlled.		The UN's International Panel on Climate Change (IPCC)'s 2023 report states: "Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020." This document aims to help mitigate against impacts and reduce what we can. We can only comment on matters that we can influence as a borough council, and population is not one of them.	N/A

Individual asks if summary pages can be produced		Noted. The checklists in the appendix are intended to be used as summary pages that applicants can easily access and use. The rest of the document has been condensed as much as possible, without losing important content.	N/A
Individual suggests that diagrams might be too conceptual for an SPD intended to support local plan policy		Noted.	N/A
Individual suggests that details/info on buildings used in photos would be helpful for those not familiar with the borough, particularly new builds.		Noted. The photos in the document are not taken directly from the borough, they have just been used as examples.	N/A
Individual suggests that the format of the SPD should be consistent throughout e.g. column position		Disagree. The report format is as consistent throughout as it can be. Some pages have slightly different formats due to the images or graphics needed on the page, to help create further understanding.	N/A
RBBC main observation is that further clarity is needed to provide clarity on what the policy requirements are vs. the aspirational requirements. Additionally, technical detail on how developers demonstrate these policy requirements are met or exceeded e.g. achieving certain credits under BREEAM.		Noted and changes proposed.	Added a range of suggested metrics that Major Applications could use to demonstrate sustainability credentials in an accredited way or using an external methodology.
RBBC suggest that checklist 3 describes the energy hierarchy in relation to the policy requirement and that it would be useful further up. (page 14)		Noted.	Added 10% requirement to para 2.18
RBBC highlights that the introduction to checklist 2 makes reference to householder applications. This should be removed as a householder will use checklist 1.		Agree.	This was a typo and has been fixed
RBBC highlight that the mandatory BNG date has now been changed to January 2024.		Agree. When the document was written the mandatory date was November 2023. This has now been pushed back to January 2024.	Page 30. Edited to make it date agnostic in case of future delay.

RBBC ask if there is an opportunity to say whether non-residential developments should achieve water efficiency credits in order to achieve their Very Good rating (or above)?		Noted, but currently no mention of BREEAM in local plan.	N/A
RBBC ask if the UGF has been adopted as part of the Core Strategy, or is hoping to be adopted as part of the emerging Local Plan? Is there a link to the use of the tool that can be included?		The UGF is not a requirement of the Local Plan.	Page 35 para 2.68
RBBC ask if the referenced section should point developers to SCC's extensive SuDS guidance?		Agree.	
RBBC ask if there is an opportunity in the Materials, Construction & Waste section to suggest credits that developers could aim to achieve in order to get their Very Good (or above) rating (e.g. from the Materials category, or Waste category).		No mention in local plan of BREEAM.	N/A
RBBC suggest that although a WLC assessment isn't a policy requirement, this section provides a good opportunity to suggest how developers who are willing to do a WLC assessment should submit such evidence as part of the planning application (e.g. using RICS professional statement). They comment that telling developers that it's important to assess WLC but not suggesting a mechanism to do so could be a bit confusing.		Noted.	Page 28. Added a range of suggested metrics that Major Applications could use to demonstrate sustainability credentials in an accredited way or using an external methodology.
RBBC comment that electric charging points for cars should definitely be provided in new development, now that Part S Building Regs have been introduced. They also comment that		Noted. Covered by Building Regs.	Page 25 para 2.38. Referenced Surrey EV parking standards

SCC's EV Parking Standards should be referenced here if we used them.			
RBBC suggest that guidance should be provided to developers on how to calculate and demonstrate to DM officers % of total energy met by renewables. % of total energy met by renewables. They also suggest guidance on Air Source Heat Pumps.		Noted.	Although additional guidance on heat pumps won't be covered in this document, we will produce a resource and publish on our website.
RBBC suggest that there should be reference made to any BREEAM credits that developers can achieve in terms of energy, in order to gain the Very Good or above rating, and specify which Spelthorne would like to see prioritised.		Unavailable resources to do this.	
RBBC suggest that it could be confusing for developers to know what it a policy requirement and what is encouragement.		Noted.	
RBBC questions if monitoring performance creeps into a policy requirement. They suggest that more guidance is needed on the mechanism for developers to do this.		Noted.	
RBBC suggest that this is a good location to provide applicants with advice on how energy efficiency aspects of the CfSH Level 3 policy requirement in policy CC1(e) have now been superseded by an uplift in Part L requirements.		Noted. Building Regs requirement addressed in the document.	
RBBC suggest that this is a good location to include more guidance on integrating solar panels with heritage assets, or to reference Historic England's advice		Noted and change to be made.	Page 18 para 2.18. Reference to HE guidance included

RBBC ask if Spelthorne have any existing heat networks mapped to assist developers in where they can connect.		The Council does not currently hold this data.	N/A
RBBC suggest that it could be beneficial to explain how overheating/cooling objectives should account for new Building Regs.		Noted.	N/A
RBBC comment that the term 'Net Zero' needs to be described in more detail. They ask if the council have an accredited carbon offsetting scheme in place for developers in place of meeting requirements		Net Zero defined in the SPD, to the required degree. No current policy requirement for carbon offsetting in policy.	N/A
National Highways we welcome the Council's transport visions to (1) follow the Travel Hierarchies in Surrey's Local Transport Plan (LTP4), (2) design for 'filtered permeability' and liveable neighbourhoods, (3) locate development for sustainable travel choices and, (4) provide infrastructure for sustainable transport. We also note that an appropriate Climate Change Checklist should be submitted alongside a planning application to the Council.		Noted.	
Historic England [] has no specific comments to make on the Draft Climate Change SPD as it deals with matters largely beyond its remit.		Noted.	

Question 2a. Do you consider that the SPD uses clear language and explains technical terms and ideas in an accessible way?			
Key Issue	Sub Issue	Officer response	Relevant section and change details

Individual comments that it is clear but it is objectionable that permissions will be refused for non-compliance		Noted. This is a supplementary planning document, not planning policy. This document is a guide to those applying for planning permission, asking them to consider and complete the checklists provided. A planning application will not be denied based on them not carrying out any climate mitigation measures.	
Individual [] comments that it is not clear how seriously the guide will be applied in planning permissions and how firmly it will be enforced		Noted.	Add to introduction of the document more simply the application of the guide and enforcement. Para 1.24 has been rephrased and sections emphasized.
Individual comments that too much information is tedious to read		Noted. We have tried to condense the content of this SPD into as few pages as possible to make it accessible and easy to read. However, due to the complex nature of the subject, the amount of pages reflects this.	N/A
Individuals comment that it is difficult to undertake this consultation on a smartphone.		Noted. This should be amended for any future consultation.	N/A
Individual comments there is no real explanation to what the theory means.		Disagree. The SPD goes into detail about the theory of climate change and the core themes that the SPD covers.	N/A
Individual comments that the document does not deal with hydrology and ground water		<p>N/A to this question.</p> <p>This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information.</p> <p>Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.</p>	N/A

Individuals [] comment that it is difficult to navigate for a busy person and the document is too long and complex for the normal public.		Noted. We have tried to condense the content of this SPD into as few pages as possible to make it accessible and easy to read. However, due to the complex nature of the subject, the amount of pages reflects this.	N/A
Individual comments that not all areas are detailed enough. Need further information on freehold houses as well as new leasehold apartments.		Noted.	N/A

Question 2b. Do you consider the diagrams within the SPD are easy to understand and provide sufficient detail?			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that formats are not supported on some devices.		Noted. This should be amended for any future consultation.	N/A, but will consider this for future consultations.
Individual comments that the document does not deal with hydrology and ground water		N/A to this question. This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	N/A
Individual [] comments that the Building Illustrations are good but all themes could be overlaid onto one page or a live webpage if resources allow.		Noted. A web page with this feature isn't possible at the moment.	N/A

Question 2c. Do you consider the SPD is laid out in a way that guides applicants to the information relating to the scale of development that is relevant for them?			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that householder applicants and smaller developments should be subject to considerably less onerous requirements than those proposed		The checklists set out in Appendix A set out three different checklists depending on the typology of development. Checklist 1 deals with householder applications, checklist 2 minor applications and checklist 3 major applications. It is not essential that all requirements must be fulfilled.	N/A
Individual comments that the document does not deal with hydrology and ground water		N/A to this question. This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	N/A
Individual comments that there are too many ifs and buts – can cause confusion.		Disagree.	N/A

Question 2d. Do you consider the ‘How to Use this Guidance’ flowchart on page 12 clearly guides applicants through the document and sets out what applicants will need to submit with their application?			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that householder applicants and smaller developments should be subject to considerably less onerous requirements than those proposed		The checklists set out in Appendix A set out three different checklists depending on the typology of development. Checklist 1 deals with householder applications, checklist 2 minor applications and checklist 3 major applications. It is not essential that all requirements must be fulfilled.	N/A

Individual comments that the document does not deal with hydrology and ground water		<p>N/A to this question.</p> <p>This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information.</p> <p>Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.</p>	N/A
Individual comments that it is not engaging.		Noted. As a planning document, we have tried to make it as engaging as possible as well as making sure that the content covers everything that it needs to.	N/A
Individual suggests that there should be more emphasis on planting, landscaping and the retention of trees as an integral part of building design and planning submissions.		Disagree. Green infrastructure is a main component of the SPD (Page 30). The checklists (Appendix A) provide adaptations of core policy to include protecting and improving the landscape (EN8) and biodiversity and maintaining and improving the environment (SP6).	N/A
Individual comments that the diagram is too high level. Although it is easy to understand, they had to go through the entire document to understand what was being spoken about.		Noted. The document is structured in a way to explain each of the core themes before introducing the checklists.	N/A
Individual comments that page numbers with links would be useful.		Noted.	Page numbers added to flow diagram

Question 2e. Please provide any other comments relating to the clarity and accessibility of the SPD			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that the document is too long, and need a shorter version.		Noted. However, we have condensed the content of this SPD into as few pages as possible to make it accessible and easy to read. Due to the complex nature of the subject, the amount of pages reflects this.	N/A

		The checklist section of the document should be used by applicants. There is not a necessity to read the rest of the document, unless needed for further detail.	
Individual comments that the document does not deal with hydrology and ground water		N/A to this question. This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	N/A
Individual comments that more publicity was needed to promote accessibility.		Noted. The consultation was open from 18 th September – 16 th October. The documents were published on the Council website as well as being available for the public to view in public libraries and at the civic centre during office hours. However, we will take this on board for future consultations.	N/A
Individual comments that the document goes against the Prime Minister decision		Noted.	N/A

3a. Do you consider that it is clear which checklist must be completed, based on the scale of development proposed?			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that the document does not deal with hydrology and ground water		N/A to this question. This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be	N/A

		implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	
Individual comments on the lack of reliable public transport and the need for more cycle lane infrastructure.		Discussed in prior sections. As a two-tier authority, transport in the borough is dealt with by the Surrey County Council highways team.	N/A
Individual comments that it should be clearer and given access to everyone in the same way.		Noted. As a planning document for applicants we have tried to make it as engaging and clear to use as possible.	N/A

3b. Do you consider that the checklists enable easy cross referencing with the SPD to guide applicants?

Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that it is too much cross referencing		Noted. It is a complex document, and to understand the checklists cross referencing is essential.	N/A
Individual comments that it is too generic and doesn't include properties and freehold options, only a focus on new build.		This document is an SPD for the local plan. The local plan is a document that deals with future development in the borough. However, the SPD does include information on retrofitting existing homes (Pages 20 & 27). Additionally, the checklists cover extensions.	N/A

3c. Do you consider that the checklists are set out in a way which would be straightforward to complete?

Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual comments that it is not in a sensible order		Noted.	N/A
Individual comments that it is very time consuming		Noted. We understand that this document may be time consuming if read in one sitting. We have tried to make it user friendly so that it is easy to find the section that an applicant needs. Additionally, the appendix checklists should be the main source of use for those making an application, with the first sections as supplementary information to help understand the checklists.	N/A
Individual comments that public transport needs to be improved before other measures are implemented.		Noted. As a two-tier authority, transport in the borough is dealt with by the Surrey County Council highways team.	N/A

3d. Please provide any other comments relating to the checklists.			
Key Issue	Sub Issue	Officer response	Relevant section and change details
Individual asks how compliance will be measured.		Every planning application will be required to submit the set of checklists that for the construction they are applying for. As this document is an SPD, not policy, there is not a minimum amount of compliance needed for planning approval.	N/A
Individual comments on a lack of consideration of hydrological considerations and ground water flow.		This document covers hydrological considerations in the Water Chapter (pages 33 to 36). This covers extreme weather events, reduction of water resources, Sustainable Drainage Systems (SuDS) and water efficiency. There is also further references in section 2.72 for more detailed information. Additionally, due to this document being an SPD (Supplementary Planning Document), it does not set policy but provides further guidance on how policies or proposals set out in the adopted Local Plan Documents will be implemented. Please see more information on hydrological matter in Policy SP7 of the Local Plan.	N/A
Individual comments that targets are unmanageable and should be pushed back further than 2050.		As this document is an SPD, not policy, there is not a minimum amount of compliance needed for planning approval. The checklists must be submitted alongside a planning application, and should make applicants think about measures they could be carrying out, some easier than others. It is down to the applicant to decide what is or isn't feasible to them.	N/A
Individual comments that Surrey Highways don't listen to the public and cause dangerous roads.		This comment is unrelated to the SPD content. Surrey County Council deal with highways and roads in Spelthorne.	N/A
Individual comments that they can only comment on the layout and graphics of the document, not the content. They question the appropriateness of the contents in relation to Spelthorne.		Question 1 asks for overall feedback on the document as a whole. Question 2a asks about the language and technical terms used. Climate mitigation and adaptation in development is something that is increasingly being considered across the UK. Spelthorne would like to be amongst those integrating it where possible, and providing information to applicants. This document is not policy, so will not penalise applicants if they do not carry out any climate related measures, however, it provides the relevant information and advice for those that do.	N/A

Individual comments that the document only focuses on new build and leaseholders.		This document is supplementary to the local plan, which is a planning document that focuses on new development in the borough. This is in line with the NPPF, which the local plan is written in accordance to.	N/A
Individual comments on public transport and recurrent issues with TFL.		Not in the scope of this document.	N/A