

## **Consultation Statement**

### **Supplementary Planning Document: Climate Change and Sustainability September 2022**

#### **REGULATION 12 - TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012**

This consultation statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that before a local planning authority adopts a supplementary planning document it must prepare 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.

This statement sets out who was consulted in the preparation of the draft Supplementary Planning Document: Climate Change and Sustainability, how they were consulted, what issues were raised and how those issues influenced the preparation of the document.

Supplementary Planning Documents (SPDs) seek to expand on existing planning policy, to provide detail and depth that may not be possible in a Local Plan. The purpose of the Climate Change and Sustainability SPD is to set out guidance on the implementation of the key Climate Change and Sustainability policies in the adopted Waverley Local Plan Part 1: Strategic Policies and Sites (LPP1) which was adopted by the Council on 20 February 2018. The SPD is also part of the Council's response to the climate emergency.

The SPD covers topics related to minimising energy use in new developments, sustainable site layout, landscaping, layout, and orientation of buildings, climate change resilience and adaptation, use of sustainable resources and materials and sustainable management of waste, water efficiency, and design to encourage use of sustainable forms of transport. The SPD does not create new policy, it provides a further level of detail to guide development proposals.

Once adopted the SPD will be a material consideration in the determination of planning applications, alongside the Local Plan and other planning policies.

#### **Consultation: Stage One**

The contents of the draft Climate Change and Sustainability SPD have been subject to discussion and meetings between the consultants, officers, Members and external stakeholders. Detailed comments were received on the scope and content of the SPD.

Consultations were held as follows:

- Online meetings with Waverley Borough Council (WBC) Planning Policy Officers in late October and early November 2021 to discuss the proposed scope of the SPD.
- Online meeting with WBC Development Management Officers on 17th November 2021.
- Online meetings with relevant WBC Councillors on 1st December 2021 and 19th January 2022.
- Online consultation with external stakeholders on 15th December 2021. Invites were sent to Surrey County Council, Surrey Wildlife Trust, Surrey Nature Partnership, the

Carbon Trust, Extinction Rebellion, Farnham BAP, Borne Conservation Group, Waverley Friends of the Earth and Surrey Climate Commission.

Appendix 1 provides a summary of the response to comments raised.

Comments were also received on the draft SPD from the WBC Overview and Scrutiny Committee on 21<sup>st</sup> March 2022.

### **Consultation Process**

The Draft Climate Change and Sustainability SPD was consulted on between 28th June and 29th July 2022 in accordance with the Council's Statement of Community Involvement. The Council published the Draft SPD and accompanying document on its website and planning policy consultation portal and placed hard copies in the Council's offices and local libraries. All members of the Council's local plan database were notified of the consultation by email or letter. The database includes statutory consultees, town and parish councils, residents associations/groups, local businesses, developers and landowners and Waverley residents. A public notice was also placed in the Surrey Advertiser and Farnham and Haslemere Heralds setting out the details of the consultation and how representations could be made.

A consultation briefing session for the town and parish councils was held via Zoom on 27th June 2022.

Consultees and members of the public were invited to comment via the following methods:

- Using our online consultation portal at [www.waverley.gov.uk/ClimateSPD](http://www.waverley.gov.uk/ClimateSPD).
- By email to [planningpolicy@waverley.gov.uk](mailto:planningpolicy@waverley.gov.uk).
- By post to Climate Change and Sustainability SPD, Planning Policy, Planning Services, Waverley Borough Council, The Burys, Godalming, GU7 1HR.

The full representations are published on the Councils planning policy consultation portal at <https://waverley.inconsult.uk/ClimateSPD/listRepresentations>.

All representations received have been recorded, analysed and recommendations made about how they should be taken into account to inform the final SPD.

A summary of the main issues raised and how the comments have been considered and addressed are included in the table overleaf.

Section	Summary of issues raised	How the issue has been addressed
Throughout document	Some consultees were concerned that more of the measures should be requirements ('must' measures) whereas others felt there should be less or no requirements in the SPD.	<p>The SPD does not create new policy, it provides a further level of detail to guide development proposals.</p> <p>All could, should and must measures were reviewed to ensure must is used only where it is justifiable under an existing policy requirement and that where possible should is being used rather than could.</p>
Throughout document	The document does not make clear where the must requirements are.	A clearer split between requirements and guidance is made by highlighting measures that are required ('must' measures).
Throughout document	The terminology for SuDS is Sustainable Drainage Systems.	Correction made throughout document.
Glossary	Suggestion that all glossary definitions match those in the NPPF	Glossary has been reviewed to ensure compliance with NPPF definitions and amendments made to Air Quality Management Areas, Conservation, Green and Blue Infrastructure, Wildlife Corridors.
Introduction	It needs to be made clear that the remit of an SPD is not to introduce policy.	Para 1.7 has been added to make clear that the SPD does not introduce new planning policies into the development plan.
Introduction	The requirement to submit how the content of the SPD has been addressed in any pre-application advice may be premature with initial pre-application advice often looking at the principle of development rather than the detail of dwelling construction, energy efficient measures and other measures covered in the Climate Change and Sustainability Checklist.	Amendment to page 2 to clarify that pre-app submissions should demonstrate how the SPD has been considered within the evolution the design.
Introduction/General	Surrey County Council Local Transport Plan 4 was adopted in July 2022 and as such, the current references are out of date.	Updated text throughout to reflect adoption of LTP4 in July 2022.
Introduction	Building Regulations have been uplifted in June 2022 and the SPD needs to reflect the update.,	Para 1.11 updated to reflect adoption of June 2022 interim uplifts.

Section	Summary of issues raised	How the issue has been addressed
Introduction	It is not clear whether the SPD will apply to WBC Local Plan Part 2 and non-allocated sites.	Para. 1.8 added to state that the SPD also applies to all development proposals including allocated and non-allocated sites.
Introduction	North / south road connectivity from the A3 to other parts of the borough is poor. This should be replaced with more accurate terminology.	The text in para. 1.19 has changed to clarify that connectivity from the east and west of the borough to the A3 is poor.
Chapter 2	Concerns were raised that encouraging district heating might discourage the fabric first approach, which in some cases can minimise the need for space heating.	The energy hierarchy is set out within the SPD to strengthen the fabric first policy and to encourage the consideration of reducing energy demand through a fabric first approach. However para 2.21 has been updated to clarify that district heating infrastructure to provide heat energy for developments may not be necessary if the fabric first approach results in a minimal space heating requirement and that district heating does not justify reduced thermal performance.
Chapter 2	Some measures i.e. green roof vegetation are not included on the diagram.	These measures have been added to the text on page 10.
Chapter 2	Community energy has a valuable role but isn't mentioned.	Para. 2.34 added to clarify that the Council will support community-led initiatives for renewable and low carbon energy.
Chapter 2	encourage developers to ensure dwellings are future proofed so that development can be adapted to be carbon neutral without significant retrofit	Para 2.16 is added to require applicants to retrofit low carbon heating in the future.
Chapter 2	The SPD does encourage re-use of existing buildings, which at least needs to be considered as an alternative to new builds.	Para 2.36 added to make clear that demolition should be justified in relation to sustainability objectives and that Applicants should consider the re-use of existing buildings.
Chapter 3	Clarify that SUDS is an NPPF requirement within major development proposals.	Clarification of this requirement has been added to para 3.10.

<b>Section</b>	<b>Summary of issues raised</b>	<b>How the issue has been addressed</b>
Chapter 3	SUDS should be designed to ensure the health, safety and well-being of residents and visitors.	This has been added to para 3.10.
Chapter 3	Include consideration of drought-tolerant species.	Para 3.17 amended to include consideration of drought tolerant species.
Chapter 3	Discharging rainwater into sewers should be avoided where possible to reduce sewer flooding.	Para 3.8 added to state that applicants should find alternative drainage measures to discharging rainwater directly into the sewer system.
Chapter 3	Retention basins are only one option and non-stagnant water bodies should be given consideration.	Para 3.14 added to clarify that other options should be considered.
Chapter 4	Clarify that all sources of flooding need to be considered, including sewer flooding.	Para 1.32 added to clarify that risk from all sources of flooding must be assessed. Para 4.4 amended to clarify that sewer flooding should be considered.
Chapter 4	Clarify that it may be necessary for more stringent measures which goes above and beyond what is outlined in this SPD to be required to ensure proposed developments are for example safe from the risk of flooding over the lifetime of the development.	Para 4.6 added to clarify that more stringent measures may be required.
Chapter 5	Where off site transportation of waste is necessary, measures should be taken to reduce transport distances.	Para 5.4 added to reflect this consideration.
Chapter 5	Farnham is being dealt with separately to the rest of Waverley, and therefore Applicants should therefore consider the Farnham Local Cycling and Walking Infrastructure Plan.	Para 7.12 amended to require references to Farnham LCWIP.
Chapter 5	Cycle parking should be undercover, lit, secure, adequately signed and as close to the destination as possible (within 20m), in accordance with SCC vehicular, electric vehicle and cycle parking guidance for new developments.	Para 7.22 amended to include this requirement and reference made to relevant SCC guidance.
Chapter 5	Reference should be made to guidance on 'liveable neighbourhoods' and their key characteristics as set out within LPT4.	Reference made within para 7.33.
Climate Change Checklist	include additional energy efficiency measures from the main body of the SPD, and to require optimisation rather maximisation of solar gain	Use of natural ventilation, space provided for outdoor drying, re-use of existing buildings added to checklist.
Throughout	Update links to latest SCC Highways Guidance.	Links to latest SCC guidance have been updated.

<b>Section</b>	<b>Summary of issues raised</b>	<b>How the issue has been addressed</b>
Throughout	Correct paragraph numbering and typos	Consistent use of Applicant rather than Developer have been implemented together with other typo corrections

# Appendix 1 – Stage 1 Interim Consultation Statement

## Waverley Borough Council: Climate Change and Sustainability Supplementary Planning Document

### Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012

This statement sets out those people who were consulted by LUC, on behalf of Waverley Borough Council (WBC), in the preparation of the Climate Change and Sustainability Supplementary Planning Document (SPD), how they were consulted, what issues they raised and how those issues were addressed within the document.

This SPD strengthens Waverley Borough Council’s position on addressing climate change and it introduces a requirement for planning applicants to consider the document during the preparation of requests for pre-application advice and planning applications.

Consultations were held as follows:

- Online meetings with WBC Planning Policy Officers in late October and early November 2021 to discuss the proposed scope of the document.
- Online meeting with WBC Development Management Officers on 17<sup>th</sup> November 2021.
- Online meetings with relevant WBC Councillors on 1<sup>st</sup> December 2021 and 19<sup>th</sup> January 2022.
- Online consultation with external stakeholders on 15<sup>th</sup> December 2021. Invites were sent to Surrey County Council, Surrey Wildlife Trust, Surrey Nature Partnership, the Carbon Trust, Extinction Rebellion, Farnham BAP, Borne Conservation Group, Waverley Friends of the Earth and Surrey Climate Commission.

This Statement will be updated on receipt of responses to the statutory period of public consultation.

Table 1.1: Comments Received Prior to Formal Consultation

Consultee	How	Issues Raised	Response
Waverley Borough Council Development Management and Planning Policy Team	Online meeting	<ul style="list-style-type: none"> <li>■ Ensure that the SPD provides a clear guidance on what is required to get a planning approval.</li> </ul>	LUC has made clear what is required of applicant indicating it with a ‘must’, other measures specify ‘should’ or ‘could’ interventions.
		<ul style="list-style-type: none"> <li>■ Provide good and bad practice examples.</li> </ul>	LUC has provided a number of good examples within the document.
		<ul style="list-style-type: none"> <li>■ Ensure the SPD provides a checklist.</li> </ul>	There is a checklist provided at the end of the document.
		<ul style="list-style-type: none"> <li>■ SPD to provide guidance for extensions.</li> </ul>	The document includes guidance on extensions, in particular in relation to energy efficiency.
		<ul style="list-style-type: none"> <li>■ Ensure the SPD references the upcoming changes to Building Regulations (and Future Homes Standard).</li> </ul>	Reference to the upcoming changes to Building Regulations has been made in the introductory chapter of the SPD.

Consultee	How	Issues Raised	Response
		<ul style="list-style-type: none"> <li>Ensure the SPD provides guidance on waste and management plans for demolition and also on improving biodiversity.</li> </ul>	<p>Guidance on waste and management plans for demolition has been provided stressing the importance of circular economy principles.</p> <p>The SPD includes guidance on biodiversity net gain, green infrastructure and Sustainable Urban Drainage.</p>
		<ul style="list-style-type: none"> <li>Ensure the SPD provides guidance on active travel, especially for smaller developments.</li> </ul>	<p>A chapter of the SPD is devoted to active and sustainable travel, which provides a number of practical measures for developments.</p>
Stakeholders Consultation	Online meeting	<ul style="list-style-type: none"> <li>Ensure that the SPD encourages '15 minutes neighbourhood' concept. Guidance should enable active travel to schools to reduce traffic congestion around schools during drop off and pick up times.</li> </ul>	<p>The SPD provides guidance on '15 minutes neighbourhood' and on active and sustainable transport that is accessible for all.</p>
		<ul style="list-style-type: none"> <li>Ensure that the SPD first refers to 'fabric first' approach, passive design and only then there should be guidance on renewable energy generation.</li> </ul>	<p>The SPD was restructured to first provide guidance on 'fabric first' and passive design.</p>
		<ul style="list-style-type: none"> <li>The SPD should ensure that active travel is made possible also for people on wheelchairs. There is also a need to ensure that the SPD requires larger number of cycling parking.</li> </ul>	<p>The SPD includes a whole chapter on active travel, and provides guidance on making it accessible to all.</p>
		<ul style="list-style-type: none"> <li>Guidance should clearly set out what developers need to deliver in order to get an approval.</li> </ul>	<p>The guidance document provides a checklist for applicants.</p>
		<ul style="list-style-type: none"> <li>Ensure that references is made to best practice solutions.</li> </ul>	<p>The SPD provides best practice examples from other local authorities in England.</p>
Waverley Borough Councillors	Online Meeting	<ul style="list-style-type: none"> <li>Guidance on EV charging.</li> </ul>	<p>The final chapter of the SPD provides guidance on active and sustainable travel, and it specifically provides guidance on EV charging.</p>
		<ul style="list-style-type: none"> <li>Fabric first (energy hierarchy) requirement with location, orientation and form being at the top of the hierarchy.</li> </ul>	<p>The SPD was restructured to orientation and form 'fabric first' and passive design.</p>
		<ul style="list-style-type: none"> <li>Strong encouragement towards zero carbon, e.g. through the use of hydrogen boilers.</li> </ul>	<p>The guidance provides measures that can enable zero carbon housing.</p>
		<ul style="list-style-type: none"> <li>The 20 minute neighbourhood concept.</li> </ul>	<p>The SPD provides guidance on '15 minutes neighbourhood' and on</p>



Consultee	How	Issues Raised	Response
			active and sustainable transport that is accessible for all.
		<ul style="list-style-type: none"> <li>■ Consideration of embodied carbon.</li> </ul>	Guidance on embodied carbon is provided within the document.
		<ul style="list-style-type: none"> <li>■ Raising awareness of upcoming changes to the Building Regulations.</li> </ul>	Reference to the upcoming changes to Building Regulations has been made in the introductory chapter of the SPD.
		<ul style="list-style-type: none"> <li>■ Biodiversity, including Biodiversity Net Gain (with consideration of a requirement for a 20% Net Gain).</li> </ul>	The SPD includes guidance on biodiversity net gain, green infrastructure and Sustainable Urban Drainage.
		<ul style="list-style-type: none"> <li>■ Future proofing development for District Heating and Microgrids.</li> </ul>	The SPD provides guidance on district heating solutions.
		<ul style="list-style-type: none"> <li>■ Officers would also like to see the SPD strengthen and support policies in Neighbourhood Plans, where possible.</li> </ul>	Reference to Neighbourhood Plans made across the SPD.