

**Appendix 2: Draft Low Carbon and Sustainable Design Supplementary Planning Document – summary of consultation responses**

## Draft Low Carbon Supplementary Planning Document – Summary of Consultation Responses

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1	East Leake Parish Council	General	The Parish Council supports adoption of the SPD.	Noted
2	Ruddington Parish Council	General	The Parish Council supports adoption of the SPD.	Noted
3	Historic England	General	Historic England supports the preparation of the SPD. Recommend a section on the historic environment and a link to the Local Plan heritage policies. Historic England’s climate change strategy may help with policy wording. <a href="https://historicengland.org.uk/what-s-new/features/climate-change/our-strategy/#vision">https://historicengland.org.uk/what-s-new/features/climate-change/our-strategy/#vision</a>	An additional section on the Historic Environment at 3.46-3.48 with links to Historic England guidance has been added.
4	Historic England	2.15	Support reference to compatibility with heritage.	Noted
5	Historic England	3.5	Support references to flood prevention. Add a sentence to have regard to the significance of heritage assets and their setting at the masterplanning stage	Additional text has been included at paragraph 3.5: “When planning for and designing layouts, this needs to consider aspects such as building orientation, access to sustainable transport, connectivity, green infrastructure, water conservation and management, biodiversity net gains, <u>heritage assets and their settings</u> etc. from the on-set of the design process. In doing so this can

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				reduce costs and time by beginning to integrate cross-cutting policy needs early on in the process.”
6	Historic England	General	We wish to see consideration given to the impact on waterlogged archaeology and heritage assets of any drainage initiatives. <a href="https://historicengland.org.uk/advice/technical-advice/flooding-and-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/flooding-and-historic-buildings/</a>	Additional text has been included (paragraph 3.45E): <u>“Any drainage measures should always consider the potential impact on the wider watercourse and waterlogged archaeology or heritage assets. Historic England has produced a number of documents which provide useful guidance<sup>1</sup>.”</u>
7	Historic England	3.13	Welcome reference to timber triple glazing. Recommend amending text from ‘heritage buildings’ to ‘heritage assets’.	Additional text has been included at paragraph 3.14: “Triple low e glazed slim units to fit wooden frames within Conservations Areas or heritage <del>buildings</del> <u>assets</u> may also be used.”
8	Natural England	3.37-3.43	Natural England supports the SPD, in particular the section on Blue and Green Infrastructure. Reference could be made to Natural England’s England’s Green Infrastructure Framework <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</a>	Additional text has been included at paragraph 3.38: <u>“The Green Infrastructure Framework<sup>2</sup> was launched in January 2023 and is a commitment in the Government’s 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network and has been produced to help local planning authorities and developers meet the requirements in the NPPF to consider Green Infrastructure in Local Plans and in new development.”</u>
9	Natural England	SEA	Natural England agrees that the	Noted.

<sup>1</sup> [Link to Historic England Flooding and Historic Buildings](#)

<sup>2</sup> [Link to Natural England \(2023\) Green Infrastructure Framework](#)

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			SPD does not require Strategic Environmental Assessment nor an Appropriate Assessment under the Habitats Regulations.	
10	Sport England	General	Sport England's new strategy 'Uniting the Movement' seeks to address the significant climate footprint of sport. The sustainable planning and design of sport and leisure facilities and the promotion of physical activity through the design of where we live and work, play a vital role. Active Design is design guidance produced by Sport England whose aim is to encourage physical activity in our living and working environments. <a href="#">Link to 'Uniting the Movement'</a> <a href="#">Link to 'Active Design'</a>	Additional text has been included at paragraph at 3.45D: "The inclusion of urban green space not only creates healthier developments and opportunities for informal sport and activity <sup>3</sup> ; these also contribute to urban cooling and reduce run-off."  Additional text has been included at paragraph 3.45G "Green corridors and walking and cycling routes – supporting the use of sustainable alternatives to car travel is a key element of sustainable design and layout. <u>Sport England's Active Design (2015)<sup>4</sup> contains 10 principles to consider when designing new development, including walkable communities, connected walking and cycling routes and a network of multi-functional open space....</u> "
11	Environment Agency	General	The Environment Agency supports the SPD and makes reference to the following with regards to overheating in buildings: <u>The UK Green Building Council New Homes Policy Playbook</u>	Additional text has been included at paragraph 3.13 " <u>Solar heat gain can lead to overheating, especially during the summer months through windows facing south to west and it is important to consider measures, ideally at the design stage which provide external protection so as to reduce the amount of sunlight entering the building. External protection can be provided by a brise-soleil, a</u>

<sup>3</sup> Sport England (2021). Uniting the Movement

<sup>4</sup> Sport England (2015). Active Design

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			<p><u>The LETI Climate Emergency Design Code</u>  <u>Zero Carbon Hub: Understanding Overheating Where to Start</u>  <u>BRE Overheating in Dwellings Guidance Document</u>  <u>The Good Homes Alliance's Overheating in New Homes tool</u>  <u>LGA's Climate Action: Energy, Planning and Housing page</u></p>	<p><u>horizontal louvered screen to protect windows and walls from the sun, or an awning. External blinds and shutters will provide the most protection but have the disadvantage of restricting daylight and views to the outside. Providing a light-coloured finish to flat roofs, for example on the top floor of an apartment building can reflect sunlight and reduce the potential for overheating. The Building Research Establishment and the Good Homes Alliance have produced guidance<sup>5</sup> on overheating."</u></p>
12	Pedals	General	<p>Pedals welcomes the references to cycling and other Active Travel. Recommend a section on Active Travel which references Active Travel England as a statutory consultee and the Department for Transport's documents:  Decarbonising Transport (2021)  Gear Change (2020)  Cycle Infrastructure Design Guidance (Local Transport Note 1/20) (2020)  Policy should require the design of all new cycling infrastructure to be LTN 1/20 complaint.</p>	<p>Section on Active Travel is inserted at paragraph 2.12 including links to DfT's 'Gear Change' and LTN 1/20.</p> <p><u>"Active Travel is an integral part of low carbon and sustainable design and can help tackle climate change as well as improve air quality, health and well-being. The Government has set a vision for walking and cycling to make up half of all journeys in urban areas by 2030 and established Active Travel England in 2022, a statutory consultee within the planning system, which has the responsibility for making walking, wheeling and cycling the preferred choice for transport. The Department for Transport published Local Transport Note 1/20 (LTN 1/20) in 2020 which provides guidance for the design of cycle infrastructure. Core design principles within LTN 1/20 seek to deliver cycle</u></p>

<sup>5</sup> [Link to BRE \(2016\). Overheating in Dwellings](#)  
[Link to Good Homes Alliance \(2019\). Overheating in New Homes](#)

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				<p><u>infrastructure which is simple to navigate, direct, safe, well-maintained and attractive to use. It is appropriate that all new cycling infrastructure which is part of major development is compliant with LTN 1/20.</u>"</p> <p>Sustainability Checklist includes a question on cycle infrastructure.</p>
13	Pedals	General	<p>There is the potential to maximise cycle links between new major development in Gamston, Tollerton, Radcliffe and Cotgrave to the planned foot-cycle bridge which will connect Lady Bay to Trent Basin.</p> <p>Consideration should be given to a new foot-cycle bridge connecting Ratcliffe to Long Eaton/Toton.</p>	<p>These strategic issues are beyond the scope of the SPD and are covered by the emerging Greater Nottingham Strategic Plan currently being prepared by the Greater Nottingham Planning Partnership.</p>
14	Coal Authority	General	No specific comments to make.	Noted.
15	Susan Edwards	Case Study Abbey Road	PV panels and battery storage in all new housing should be standard, as per the Abbey Road development.	It is not possible to require PV panels and battery storage as mandatory, however this is encouraged through the use of the Best Practice Sustainability Checklist in Appendix 1.
16	Susan Edwards	General	The SPD does not cover the location of new recycling facilities/school expansion and cycle paths. Local facilities and	These strategic issues are beyond the scope of the SPD and are covered by the emerging Greater Nottingham Strategic Plan and the Nottingham and Nottinghamshire Waste Local Plan currently being prepared by the

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			services need to be accessible by foot/cycling.	Greater Nottingham Planning Partnership and Nottingham City Council and Nottinghamshire County Council respectively.
17	Harworth	Executive Summary	The executive summary references the Council's commitment to becoming "carbon neutral" (for its own operations) by 2030; national policy is targeting "Net Zero Carbon" at this stage, and it would be appropriate to reflect this language.	"Carbon neutral" is retained as this is the term used in the Council's official commitment document.
18	Harworth	Executive Summary	The executive summary references both zero carbon and zero energy buildings, the descriptions of these terms could be set out more clearly to avoid confusion.	Noted that it is important not to conflate a zero-carbon building with a zero-energy building.
19	Harworth	Glossary	The executive summary references both zero carbon and zero energy buildings, the descriptions of these terms could be set out more clearly to avoid confusion.	The definition of carbon neutral within the Glossary has been changed to:  <u>"Carbon Neutral – is a state whereby the same amount of carbon is released into the atmosphere as is removed leaving a zero balance. The best way to achieve this is not to emit more carbon than can be absorbed naturally by carbon sinks, such as trees, plants and soil. a building with zero net energy consumption, meaning the total amount of energy used by the building on an annual basis is roughly equal to the amount of renewable energy created on the site, or by renewable</u>

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				<p><del>energy sources elsewhere. These buildings consequently contribute less overall greenhouse gas to the atmosphere than similar buildings. They do at times consume non-renewable energy and produce greenhouse gases, but at other times reduce energy consumption and greenhouse gas production elsewhere by the same amount."</del></p> <p>Add following definitions for a 'Zero Carbon Building' and a 'Zero Energy Building' to the Glossary.</p> <p><b><u>"Zero Carbon Building:</u></b> <u>When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset. These buildings consequently contribute less overall greenhouse gas to the atmosphere than similar buildings. They do at times consume non-renewable energy and produce greenhouse gases, but at other times reduce energy consumption and greenhouse gas production elsewhere by the same amount."</u></p> <p><b><u>"Zero Energy Building:</u></b> <u>A building with zero net energy consumption, meaning the total amount of energy used by the building on an annual basis is roughly equal to the amount of renewable energy created on the site, or by renewable energy sources elsewhere."</u></p>
20	Harworth	Chapter 2	Reference to emerging legislation regarding	Additional text has been included at paragraph 2.11:



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			Biodiversity Net Gain could be made.	<p><u>“Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand and has a role to play in addressing the climate emergency. Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain from an as yet unconfirmed date, expected to be in November 2023. The planning guidance set out in this document includes some of the ways which can contribute to biodiversity net gain.”</u></p>
21	Harworth	2.13 2.21	Policy 2 of the Core Strategy and Policy 12 of Part 2 of the Local Plan refer to different requirements for water consumption in new homes.	Policy 12 of Part 2 of the Local Plan (2019) supersedes Policy 2 of the Core Strategy (2014) and is in conformity with the optional technical standard for water efficiency within Building Regulations.
22	Harworth	3.2	The requirement for a Sustainability Statement is broadly supported, however, as worded, it is not clear what level of sustainability and/or Net Zero Carbon credentials would be required or how this would then be weighted or applied through the application process. Additional clarification around this would be helpful for applicants, for example, will	<p>The Council may set out a specific method of carbon assessment and set a requirement for this to demonstrate Net Zero Carbon within emerging policy, once greater clarity is achieved on the current planning reforms. However, the SPD will encourage the inclusion of a carbon assessment in the Sustainability Statement.</p> <p>The text at paragraph 3.49 is amended to provide further clarity, as follows:</p> <ul style="list-style-type: none"> <li>• <u>“Energy efficiency and carbon emissions of the building, including any off-site carbon offsetting such as tree planting;</u></li> </ul>

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			<p>information regarding both embodied and operational carbon be required?</p>	<ul style="list-style-type: none"> <li>• <u>Material usage, wastage, responsible sourcing and environmental impact, including embodied carbon of construction materials, construction methods and any carbon offsetting;</u></li> </ul> <p>And the following text at paragraph 3.50 (Sustainability Statement) has been added to provide clarity:</p> <p><u>“A carbon assessment is a useful tool which can be used to gain a full understanding of the net carbon emissions of a development by calculating operational carbon emissions, embodied carbon and any carbon off-setting. The carbon can be measured in kilowatt hours.”</u></p> <p>An additional section relating to planning reform is added also to help clarify matters (paragraph 2.13):</p> <p><u>“As a commitment to the Net Zero Strategy, the Government intends to carry out a fuller review of the NPPF following Royal Assent of the Levelling-up and Regeneration Bill, including consultation on a potential approach to carbon assessment which would be used as a tool for assessing individual developments in the decision-making process. The guidance set out in this document encourages the inclusion of a carbon assessment within the Sustainability Statement in order to understand operational carbon emissions, embodied carbon and any off-setting measures. In future, the Council may set out a policy requirement for a specific method of carbon assessment and the requirement to</u></p>

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				<u>demonstrate Net Zero Carbon, following implementation of the current planning reforms.”</u>
23	Harworth	3.4	Paragraph 3.4 seeks to “maximise renewable energy efficiency.” Further guidance on what an acceptable level of efficiency would be and how it would be assessed would be useful.	The Council will update the SPD following the adoption of policy in the emerging Local Plan.
24	Harworth	3.5 3.6	Paragraph 3.5 and 3.6 sets out considerations which should form part of the design process. The concepts covered within these sections include solar gain, SUDs, air quality, active travel, urban cooling and Passivhaus. We suggest that the section is redrafted to more clearly set out the Council’s requirements from the design of residential schemes, and how these requirements will be assessed through the application process.	The Council will update the SPD following the adoption of policy in the emerging Local Plan.
25	Harworth	3.11	Paragraph 3.11 notes that “The elevation with the most potential for solar gain should have a minimum distance of 11 m from the next building.” This would	Noted. It is accepted that an 11m separation distance may not always be attainable. The purpose of this guidance is to make this a consideration in the design of all new residential development.

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			clearly be unattainable for most residential development sites, having a significant impact on the densities which could be achieved and conflicting with the NPPF requirement to make efficient use of land.	
26	Harworth	3.13-3.24	“Minimising Energy Use”. It should be clarified whether the techniques mentioned are examples of best practice or if the Council intend to promote them as a way of going above and beyond existing local and national policy. If the latter is the case, the requirements would need to be justified and measurable.	The Council will update the SPD following the adoption of new policy in the emerging Local Plan.
27	Harworth	3.30	Paragraph 3.30 suggests that “materials should be locally sourced”, however it is important to make allowances for the availability of materials, in particular high-tech solutions which may not be accessible locally.	Noted. It is accepted that it is not always possible to use locally-sourced materials.
28	Harworth	p.18	The section on BGI covers a variety of sustainability concepts and references research projects, but lacks	The Council will update the SPD following the adoption of policy in the emerging Local Plan. Any proposal for SuDs would need to be compliant with relevant legislation and planning practice guidance in any case.

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			clarity on how these should be considered through the planning process. In particular, the references to SuDS should include the Flood Water Management Act and national planning guidance.	
29	Stagfield Group	p.11	Suggested word change. Considering different layout options to achieve <del>maximum</del> <u>optimal</u> solar gain and integration of solar panels.	Amended text at page 13 bullet 1: “Considering different layout options to achieve <del>maximum</del> <u>optimal</u> solar gain and integration of solar panels;”
30	Stagfield Group	4. Case Study	Please may your reference Stagfield Group as developer in the Case Study. 4.1 The development by <u>Stagfield Group and Peveril Homes</u> for 71 homes located at Abbey Road in West Bridgford was permitted in October 2021.	Amended text at paragraph 4.1: “The development by <u>Stagfield Group and Peveril Homes</u> for 71 homes located at Abbey Road in West Bridgford was permitted in October 2021.”
31	RES Group	General	Although the SPD is aimed at low carbon and sustainable design, there is no discussion or policy context outlined in relation to the role of commercial scale renewable energy developments, such as solar farms. It is felt that this is a missed opportunity to	The Council has prepared supplementary guidance for large-scale solar development, and will commission a Solar Landscape Sensitivity Study in July 2023.

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			highlight the importance of these types of developments and their role in sustainable development.	
32	Peter Jagger	General	<p>The following guides are still of relevance:  'Sustainable Developer Guide for Nottinghamshire' and 'A Sustainable Approach to Smaller Building Projects', both led by Nottinghamshire County Council.</p> <p>Recommend the addition of the Town and Country Planning Association's publication 'The Climate Crisis (2021)'.</p>	Noted. The guidance referred to is no longer published by Nottinghamshire County Council.
33	Peter Jagger	Appendix 1	The majority of the recommendations are aspirational and the text should be more firmly expressed.	The 'aspirational' column has been removed from Appendix 1 and replaced with a column which relates each item in the checklist to the relevant Local Plan policy. Paragraph 3.1 is amended to clarify that Appendix 1 sets out best practice.
34	Peter Jagger	4. Case Study	More case studies and best practice housing layout sketches are required.	Add case study: Bingham Arena and Enterprise Centre.
35	Ruth Edwards MP	3.5	The language should be stronger than "encouraged".	The SPD can <i>encourage</i> , but not <i>require</i> pre-application discussion.

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36	Ruth Edwards MP	Appendix 1	Roofs should be designed to incorporate solar panels by default, with opt out clauses if a development cannot meet the conditions that solar requires.	The 'aspirational' column has been removed from Appendix 1 and replaced with a column which relates each item in the checklist to the relevant Local Plan policy. Paragraph 3.1 is amended to clarify that Appendix 1 sets out best practice.