

# Climate Change Supplementary Planning Document

## Consultation Statement

A number of consultees have been contacted on the development of this SPD. Listed below are the responses to date.

Stage	Date	Consultee	Reference to Document and Abridged Comments	Response
Screening Statement	27/04/2010	DECC	Unable to comment at the moment please send through draft document when ready.	Draft document will be sent to for DECC's consultation in the Autumn
Screening Statement	16/04/2010	Natural England	<p>Why has the Council not used the broader term of 'incorporating green infrastructure'?</p> <p>Why have certain energy sources been split away from each other when it would make more sense for them to be considered as a whole?</p> <p>Why have health implications been excluded?</p>	<p>After looking again at the content of the SPD the document now includes a section on green infrastructure. This covers green/brown roofs, gardens, amenity spaces, green spaces in and urban environment and sustainable planting.</p> <p>These two have now been combined and a table added reviewing all renewable options so that information is laid out clearly in one place.</p> <p>Much consideration has been given to the Urban Heat Island Effect within the document. Many of the benefits of mitigating UHI will also work to reduce the effect of climate change on the residents of Leicester. As the SPD is primarily aimed at planners and developers we felt it was appropriate to keep the focus on developments and buildings rather than digress to health.</p> <p>No further queries from Natural England following this response.</p>

Screening Statement	19/04/2010	English Heritage	English Heritage are in agreement that an SEA is not required.  Request to be consulted further when the draft document is prepared.	Confirmation was sent to acknowledge English Heritage would be consulted fully on the draft document.
Public Consultation of Draft Document	13/10/2010	De Montfort University	<b>2.2 (Page Three):</b> Need to ensure that insulation is properly positioned. Internal wall insulation can lead to over heating where has external wall insulation will have a cooling effect  <b>6.3 (Page Six)</b> Large trees should be included in developments to help with the shading issues  <b>6.6 (Page Six)</b> Drought tolerant species can actually lead to higher air temperatures around them. Care should be taken to ensure balanced consideration RHS "Right Trees for Changing Climate" should be included as a resource  <b>7.2 (Page Seven)</b> Heading should be changed to building heat gain and overheating prevention" To ensure we don't end up with too many new builds that overheat	High levels of insulation are necessary to reach good levels of building efficiency. The document currently makes recommendations for 'high levels of fabric insulation to all elements of external and party wall construction'. Application will vary from site to site.  Planting issues and recommendations are dealt with in 6.4  Serious consideration is given to tree species selection and recommendations are different dependent on site. The document does not recommend 'drought tolerant plants' as such but recommends native species that do not require very high levels of watering.  The paragraph talks about the risks of overheating within the title 'Building Heat Gain' change of title would lead to inclusion of unnecessary technical phrases.
Public Consultation of Draft Document	13/10/2010	Natural England	Grateful that their previous comments have been taken on board and as a result NE have no further comments to make.  Natural England fully support the document	No action required

Public Consultation of Draft Document	18/10/2010	Leicestershire Police	<p>Author should review 'Secured by Design Initiative (SbD)' and promote it with the document.</p> <p><b>1.0 (Page Two):</b> The carbon cost of crime should be referenced in the introduction to the SPD</p> <p><b>2.2 (Page Three):</b> bear in mind security and noise issues of party wall insulation – maybe add a footnote on the issues raised in Para 38 of the New Homes Guide</p> <p><b>3.0 (Page Four):</b> What is the point in locating major development on public transport routes when the DC policies promote too much parking in these locations? Why is so much space given over to catering for the car?</p> <p><b>4.0 (Page Four):</b> Reference the sBd here</p> <p><b>6.3 (Page Six):</b> Need to make reference to outdoor spaces and public safety. Promotion of private garden spaces can reduce crime and have the same impact.</p> <p><b>General comment:</b> need to stress the importance of local amenities to reduce travel to shops/schools etc.</p>	<p>This document has been reviewed and its importance noted. A reference to sensitive layout has been placed in 6.3 and the Secured by Design publication referenced in 'Sources of further information'</p> <p>Building Regulations now have extensive advice on party wall construction. Therefore it is not meaningful to place a large reference to them within this document.</p> <p>The issue of parking within the central ring road is currently being dealt with through a Parking Strategy SPD which is due for publication in 2011.</p> <p>Document has been referenced in 6.3</p> <p>Care is taken in each development to ensure that outdoor spaces are as useable as possible.</p> <p>A reference to Local Amenities was made in 3.1.</p>
Public Consultation of Draft Document	25 October 2010	The Coal Authority	Have reviewed the documents and have no specific comments to make.	No action required

Public Consultation of Draft Document	28 October 2010	WYG Engineering	<p><b>1.1 (Page Two):</b> Should aim to set out challenging standards for developers to reach</p> <p><b>1.3 (Page Two):</b> Careful with the phrase ‘feasibility’</p> <p><b>1.3 (Page Two):</b> Should read “must comply with Ene1 of CSH L3 as this represents new building regs Mandatory CSH pre-assessment Mandatory percentage of Zero Carbon homes in each development Insist on PassivHaus</p> <p><b>1.1 (Page Two):</b> Define the relationship between the new SPD and the Energy SPD</p> <p><b>2.1 (Page Three):</b> Also need to include references to optimising natural daylight, ventilation and passive cooling</p> <p><b>2.2 (Page Three):</b> Include examples of compliance solutions - How do we envisage how the allowable solutions mechanisms will work</p> <p><b>7.3 (Page Seven):</b> Consider Lifetime Homes Standard</p>	<p>We are unable to set formal targets for developers in this document however we believe we have been aspirational in the ‘What To Aim For’ sections</p> <p>This policy on Code for Sustainable Homes is an element of the Core Strategy for Leicester which is scheduled for adoption on the 25<sup>th</sup> November 2010. This wording is not open to change.</p> <p>As above</p> <p>It has been outlined that this document sits alongside and supports the Energy Efficiency and Renewables SPD that already exists.</p> <p>These comments have been adopted. References to natural daylight and ventilation have been made in 7.2</p> <p>Leicester City Council are currently working on strategies of how this could be implemented in Leicester. These will be published in due course.</p> <p>Reference to the Lifetime Homes Standard has been inserted in 7.3.</p>
---------------------------------------	-----------------	-----------------	--	--

Public Consultation of Draft Document	2 November 2010	English Heritage	<p><b>4.1 (Page Four):</b> Consider the embodied energy within existing buildings and recommend renovation rather than new development. Possible reference to Reviving Britain's Heritage (SAVE)</p> <p><b>5.1 (Page Five):</b> English Heritage has produced an advice note on Flooding and Historic Buildings</p> <p><b>6.4 (Page Six):</b> There has been a trend to move away from long lifespan trees to short lifespan trees. Mature trees should be retained where possible.</p>	<p>This comment has been adopted and references can be found in 4.1</p> <p>This comment has been adopted and references can be found in 8.4</p> <p>The document does recommend the retention of mature trees and serious consideration is given to tree species selection and recommendations are different dependent on site.</p>
Public Consultation of Draft Document	5 November 2010	Friends of the Earth Leicester	<p><b>General Comment:</b> Actions are not recommended strongly enough. More specific targets would be helpful.</p> <p><b>3.0 (Page Four):</b> More emphasis needs to be placed on cycling and walking facilities as electric vehicles still lead to carbon emissions.</p> <p><b>3.1 (Page Four):</b> Alternate wording recommended as: 'own transport' – 'private motorised transport' and 'addition of non motorised transport'. The document should insist on provisions for cyclists and creation of new public transport facilities.</p> <p><b>4.0 (Page Four):</b> Developers should be encouraged to use AT LEAST 25% recycled materials</p>	<p>We cannot insist on specific targets through this document. Further targets will be considered at Site Allocations Stage.</p> <p>The word 'motorised' has been added into 3.1 to clarify this point.</p> <p>This section has been strengthened with the explanation to developers that transport assessments are required for large developments and travel packs for smaller development. The Travel Team are consulted on planning applications and ensure that developers have taken appropriate steps for public transport.</p> <p>The change of wording would turn this statement into a target. We cannot insist on specific targets through this document. Further targets will be considered at Site Allocations Stage.</p>

			<p><b>5.0 (Page Five):</b> Building on areas at risk of flooding should not be permitted</p> <p><b>6.0 (Page Six):</b> Green/Brown roofs need to be installed on ALL suitable roofs in new developments</p>	<p>The Flood Risk Hierarchy mentioned in 5.1 states that development of a flood risk area should be avoided in the first instance however, there are certain situations in which this may not be avoidable. In these cases advice is provided on how to manage risk.</p> <p>There are many roofs for which green/brown roofs are not appropriate as this document covers renovations also. The wording in this section is already appropriate for the purpose of the document.</p>
Public Consultation of Draft Document	16 November 2010	Environment Agency	<p><b>5.1 (Page Five):</b> Proposed change to wording “When designing is should be noted that 20% should be added to the expected flow of watercourses to allow for the future effects of climate change and it should be ensured that any such proposals do not increase flood risk to others.”</p> <p><b>5.3` (Page Five):</b> Proposed change to wording “culvert” should be “concrete channel”.</p> <p><b>5.5 (Page Five):</b> Proposed change to wording “Therefore development should incorporate elements of SUDS into roadways”</p>	<p>This comment has been adopted and references can be found in 5.1</p> <p>This comment has been adopted and references can be found in 5.3</p> <p>This comment has been adopted and references can be found in 5.5</p>