

Broxtowe Borough Council and Nottingham City Council:

# Reduction of Carbon in New Development

## Supplementary Planning Document

## Report of Consultation



**Nottingham**  
City Council



**Broxtowe**  
Borough  
COUNCIL

**CN28**  
Carbon Neutral Nottingham 2028

Climate Change  
& Green Futures

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## **1.0 Purpose of the SPD**

- 1.1 The Reduction of Carbon in New Developments Supplementary Planning Document (Carbon SPD) has been jointly prepared by Broxtowe Borough and Nottingham City Councils to provide more detailed guidance on how development can lower carbon emissions, reduce energy demand, improve the energy efficiency and the use of renewable energy in new developments.

## **2.0 Persons/bodies/groups consulted**

- 2.1 Consultation was undertaken with statutory bodies, local businesses, citizens, agents and developers, wider interest groups and stakeholders, local councillors, and Broxtowe Borough Council and Nottingham City Council officers. E-mails/letters providing details of the consultation were sent to all contacts on the joint Local Plan database of consultees (Inovem).

## **3.0 Ways in which consultation was undertaken**

- 3.1 Consultation was undertaken in line with the [Broxtowe Statement of Community Involvement](#) (October 2022) and the City Council's Interim [Statement of Community Involvement](#) (June 2023). Online consultation was undertaken, with the document being available to view and download from the Councils' web sites. A consultation summary was also provided. It was also available for inspection at the City Council main office, Loxley House and at Broxtowe Borough Council's Council Offices.
- 3.2 Comments on the draft document were invited for a 6-week period ending 30 September 2024.
- 3.3 Several articles from local newspapers were published at the start of the consultation period:
- [Nottingham City Council News Article](#);
  - [Nottingham Post News Article](#)

## **4.0 Representations**

- 4.1 There were 19 respondees in total. All comments have been considered and a number of amendments to the draft SPD have been made as a result.
- 4.2 Appendix 1 sets out a summary of the comments made and the Councils' responses to them, together with any recommended changes to the document. This report does not attempt to capture every point made, nor does it cover comments on aspects of policy that fall outside the scope of the consultation. This document sets out the changes the Councils have made in response to the main points raised in the consultation and where the Councils have not made changes, the reasons are explained.
- 4.3 In summary the proposed changes as a result of the consultation are as follows;

- Added references to Natural England's Green Infrastructure Framework and the GI Planning & Design Guide (paragraph 75) to provide additional resources and guidance on green and blue infrastructure.
- Removed the requirement for third-party audits and required applicants to provide justification for full or partial demolition within the Sustainability and Energy Statement to reduce the burden on applicants and clarify the application process.
- Added references to blue roofs, drainage, and sustainable urban systems to emphasize the importance of BGI in flood risk management and urban cooling.
- Added a new paragraph (129) to address the impact on the historic environment when assessing renewable energy sources to ensure heritage assets are carefully considered.
- Added Policy CC1 to Table 2 regarding building re-use and retrofit to ensure comprehensive coverage of relevant policies.
- Added reference to considering household energy storage (paragraph 133) to highlight the importance of energy storage in smoothing demand on the grid.
- Included references to considering the use of external moveable blinds to maximise internal light while preventing overheating to provide flexibility in window design and improve natural daylight.
- Added a section on drainage (section 2.9) to address the importance of permeable paving, surface run-off management, and Sustainable Drainage Systems (SuDS).
- Simplified validation requirements to match Council validation checklists and clarified that the level of detail required depends on the type and size of development proposed to ensure consistency and clarity in the application process.
- Removed references to a Council-run fund for carbon offsetting as the Councils do not currently have such a fund.
- Updated references to the National Planning Policy Framework (NPPF) to the 2024 version to ensure accuracy and clarity.
- Amended best practice text to refer to all buildings rather than just 1 and 2 storey buildings to provide more inclusive guidance.
- Updated the Sustainability Checklist to reflect the existing policy basis of both councils to ensure alignment with current policies.



## **5.0 Sustainability Appraisal**

- 5.1 Undertaking a Sustainability Appraisal (SA) is a statutory requirement/ process, which must be undertaken for any new planning document in accordance with the Planning and Compulsory Purchase Act (2004). The purpose of an SA is to assess the economic, social and environmental impacts of projects, strategies or plans, so that the preferred option promotes, rather than inhibits sustainable development. In addition to an SA, European directive 2001/42/EC (commonly referred to as Strategic Environmental Assessment or SEA), requires that Local Authorities undertake an “environmental assessment” of any plans and


programmes they prepare that are likely to have a significant effect upon the environment.

- 5.2 The requirements of the SEA have been incorporated into the SA for the Aligned Core Strategy and the SAs for the Broxtowe Part 2 Local Plan and Nottingham City's Local Plan Part 2 – 2020 (LAPP). The process appraised social, environmental and economic effects. It was undertaken from the start of the plan making process and through its various preparation stages. In doing so it ensured that the decisions made on policies contributed to achieving sustainable development. Furthermore, the SA recommended some changes to ensure that the Development Plan documents were as sustainable as possible. The SA has facilitated the evaluation of alternatives and also considered the cumulative, synergistic and secondary impacts of the LAPP policies and sites.
- 5.3 The SA also demonstrated that the Plans were an appropriate approach when considering reasonable alternatives and, where negative impacts were found, suggested mitigation measures overcome them. Monitoring arrangements were also proposed to ensure that the impact of the policies can be properly evaluated. Accordingly, as an SA was undertaken as part of producing the policies to which this SPD relates, a separate SA is not required for this document.
- 5.4 Full details of the SA process, and methodology can be found at [www.nottinghamcity.gov.uk/localplan](http://www.nottinghamcity.gov.uk/localplan) and <https://www.broxtowe.gov.uk/for-you/planning/planning-policy/>.


## Appendix 1: Summary of comments, responses and amendments

Respondee	Comments received	Response and amendments
<p>Forestry Commission</p> 	<p>The Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach.</p> <p>For instance, through:</p> <ul style="list-style-type: none"> <li>• The inclusion of green infrastructure (including trees and woodland) as a requirement in and around all new development. As stated in the Environmental Improvement Plan 2023 it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. It goes on to state that that increasing tree cover is key to achieving the Net Zero Strategy and species abundance targets. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss.</li> <li>• Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's 25 Environment Plan (Page 47), the "Timber in construction" roadmap and the Net Zero Strategy.</li> </ul>	<p>Comments noted.</p> <p>The SPD emphasises the importance of trees to reduce carbon and has a section encouraging trees for shading and outlines their benefits. It also acknowledges that best practice is that trees and green spaces are integrated into the development to increase biodiversity, reduce overheating and promote outdoor recreation.</p>
<p>Natural England</p> 	<p>Natural England welcomes the SPD on the Reduction of Carbon. In particular they are pleased to see section 2.4 on Green &amp; Blue Infrastructure. GI and how this makes places more resilient and adaptive to climate change and helps to meet zero carbon and air quality targets, manage flood risk and urban cooling. GI itself should be designed to adapt to climate change to ensure long term resilience. They suggest reference to <a href="#">Natural England's Green Infrastructure Framework</a> which provides useful information and resources for planners, developers and communities could be added to the document. This also includes the <a href="#">GI Planning &amp; Design Guide</a> which</p>	<p>Agreed to add reference to <a href="#">Natural England's Green Infrastructure Framework</a> and the <a href="#">GI Planning &amp; Design Guide at paragraph 75</a>.</p>



	gives specific design guidance for GI and carbon reduction/climate change.	
Pearce Planning, on behalf of Fusion Nottingham Devco Limited	<p>Provides several representations on the draft SPD, particularly in relation to its potential impacts on the planning process for the development at King Edward Court. Their comments mainly concern the <b>pre-redevelopment</b> and <b>pre-demolition</b> audits, as well as considerations regarding <b>sustainable materials</b> and <b>embodied carbon</b>. They request clarification and raise objections to certain sections.</p> <p>Key points and proposed changes:</p> <ol style="list-style-type: none"> <li><b>Pre-redevelopment Audit (P45, paras 151–153):</b> <ul style="list-style-type: none"> <li><b>Objection:</b> The requirement for a third-party audit to assess whether an existing building can be fully or partially retained is seen as <b>onerous</b> and lacking clarity. The representation requests <b>further guidance</b> on how the audit would be assessed and how it would be considered in the determination process. Additionally, they highlight the need to balance building retention with other planning considerations, which might justify full demolition.</li> </ul> </li> <li><b>Pre-demolition Audit (P45, paras 151–153):</b> <ul style="list-style-type: none"> <li><b>Cost concerns:</b> While the requirement to assess whether materials on-site can be reused is increasingly common (especially for projects aiming for <b>BREEAM</b> ratings), the representation acknowledges the <b>cost implications</b> and requests clarity on how this will be applied.</li> </ul> </li> <li><b>Circular Economy Considerations (P46, para 155 and P47 blue box):</b> <ul style="list-style-type: none"> <li>The re-use of materials could be <b>onerous</b>, particularly without clarity on how the <b>pre-redevelopment audit</b> will be assessed. However, they find other aspects, like <b>design for optimisation and standardisation</b>, to align with typical BREEAM requirements, and believe those should be achievable.</li> </ul> </li> <li><b>Sustainable Material Selection (P51, paras 174–176):</b></li> </ol>	<p>Requirement for third party audit has been removed as it is agreed to be too onerous. However, the SPD now states that the applicant should provide justification if full or partial demolition is required which should be provided within the Sustainability and Energy Statement.</p> <p>Removed requirements to submit separate statements and audits in addition to existing validation requirements as these should be incorporated within the Sustainability and Energy Statement.</p> <p>Provided clarification that the requirements in relation to embodied carbon apply to full and outline and would not apply to amendments which did not require the submission of a new full or outline applications.</p>




	<ul style="list-style-type: none"> <li>○ These assessments, such as those related to <b>cement replacement options</b> and <b>recycled content</b>, are typically performed at <b>RIBA Stage 4</b> as part of <b>BREEAM LCA</b> and <b>MAT assessments</b>. However, the representation notes that if these assessments are required earlier in the process, a <b>Lifetime Carbon Assessment (LCA)</b> could potentially cover most requirements.</li> </ul> <p>5. <b>Embodied Carbon Considerations (P53, para 185 &amp; P54, para 194):</b></p> <ul style="list-style-type: none"> <li>○ <b>Objection:</b> There is concern about whether changes in materials post-planning would require a revised report for approval, which could create a <b>planning risk</b> if amendments occur during technical design or construction due to supply constraints or budget issues. They request clarity on how such changes would be handled to avoid these risks.</li> </ul>	
<p>National Highways</p> 	<p>Supports the draft SPD's focus on carbon reduction and sustainable construction, including measures such as low-carbon heating, energy efficiency, and minimising emissions. They commend the alignment of the SPD with the UK's climate targets and national policies like the Climate Change Act and the UK's Net Zero Strategy.</p> <p>Key recommendations and points of focus from the Highway Agency include:</p> <ul style="list-style-type: none"> <li>• Photovoltaic (PV) Panels: They support the SPD's emphasis on the use of PV panels (horizontal and vertical arrays) but stress the importance of ensuring that these installations do not affect the safety of the Strategic Road Network (SRN) by causing glint and glare. They reference Paragraph 70 of Circular 01/2022, which highlights the need for developers to assess and mitigate the risks of solar reflection visible from the SRN.</li> <li>• Glint and Glare Assessments: For developments like solar farms or buildings with expansive glass facades that may cause glint and</li> </ul>	Comments noted




	<p>glare, National Highways emphasises the need for developers to conduct solar reflection assessments to ensure driver safety on the SRN.</p> <ul style="list-style-type: none"> <li>• <b>Sustainable Construction:</b> National Highways reiterates the importance of the built environment's role in contributing to the UK's carbon emissions (25%). They offer their expertise in advising project promoters on how construction impacting the SRN can be designed and implemented sustainably.</li> </ul> <p>No specific changes to the SPD are directly recommended, but the National Highways advises maintaining a focus on ensuring that renewable energy installations near the SRN do not compromise road safety through glint and glare, and they offer their advisory role in sustainable construction projects.</p>	
<p>Environment Agency</p>  <p>Environment Agency</p>	<p>The Environment Agency (EA) supports the draft SPD's commitment to promoting carbon reduction and its inclusion of Blue-Green Infrastructure (BGI), but offers detailed recommendations related to BGI's role in reducing flood risk and enhancing environmental and social wellbeing.</p> <p>Key points and proposed changes:</p> <ol style="list-style-type: none"> <li>1. <b>Support for BGI:</b> The EA welcomes the inclusion of BGI in the SPD and emphasises its multi-benefit nature, including flood risk management, carbon sequestration, increased biodiversity, and improved health and wellbeing.</li> <li>2. <b>Flood Risk Management:</b> The EA advocates for a <b>passive approach</b> to managing flood risk by working with nature. In particular, they highlight the River Leen as an example of where engineered flood defences are unsustainable, and they recommend integrating more green space and natural floodplain in future developments near the river. They are developing a <b>Leen Strategy</b> (2025–2027) to manage flood risk and promote sustainable solutions.</li> </ol>	<p>Additional references have been made in relation to blue roofs, drainage and sustainable urban systems.</p> <p>Other comments, including the recommendation to produce a BGI specific SPD, are noted but are outside of the scope of this SPD.</p>

	<p>3. <b>BGI in Urban Design:</b> The EA suggests the SPD consider <b>biophilic design</b> (e.g., green roofs, green walls, SuDS) to enhance the connection with nature and reduce carbon. They also emphasise the importance of designing new developments to integrate with a future <b>green corridor</b> along the River Leen, improving both flood resilience and access to sustainable transport.</p> <p>4. <b>Urban Heat and SuDS:</b> The EA highlights the issue of urban heating in Nottingham and recommends <b>de-paving and greening</b> areas to provide relief from high temperatures. Coupling these measures with SuDS could manage surface water runoff and reduce local flooding.</p> <p>5. <b>Recommendation for BGI-Specific SPD:</b> The EA recommends developing a <b>Supplementary Planning Document</b> or strategy specific to Blue-Green Infrastructure to support local Green Infrastructure (GI) policies. They reference Mansfield District Council's Green Infrastructure SPD (adopted in March 2024) as a model and suggest using the Green Infrastructure Framework by Natural England as a tool for embedding GI into local plans and new developments.</p> <p>6. <b>Offer of Support:</b> The EA expresses willingness to support the development of supplementary documents related to BGI and offers to collaborate on aligning their work with the SPD, especially regarding the <b>Leen Strategy</b>.</p> <p>Only minor changes to the draft SPD are proposed, but the EA recommends further consideration of BGI's multi-benefit nature and the creation of a specific BGI-related strategy to guide future implementation.</p>	
Mining Remediation Authority - MRA (formerly known as The Coal Authority)	The MRA has reviewed the draft SPD on carbon reduction and confirms they have no specific comments on the document, as its focus is outside their primary area of concern.	Comments noted

 Mining Remediation Authority		
<p>Historic England</p>  <p><b>Historic England</b></p>	<p>Historic England is broadly supportive of the draft SPD but offers several recommendations to strengthen the protection of heritage assets and ensure their considerations are integrated into the document. Key points and proposed changes include:</p> <ol style="list-style-type: none"> <li>1. <b>Retrofitting and Heritage Assets:</b> They welcome Section 95, which addresses retrofitting for heritage assets and includes a reference to their specific advice document.</li> <li>2. <b>Historic Environment and Renewable Energy:</b> They recommend adding a section in <b>Chapter Two</b> to address <b>historic environment considerations</b> regarding renewable energy technologies, outlining what may or may not be appropriate for heritage assets.</li> <li>3. <b>Protection of Existing Buildings:</b> Historic England supports <b>paragraphs 134 and 135</b>, emphasizing the need to protect existing buildings, including heritage assets, which also contributes to the climate agenda.</li> <li>4. <b>Heritage Assets on Page 45:</b> They suggest that <b>Page 45</b> include a section on the <b>specific legislative and National Planning Policy Framework (NPPF)</b> requirements to protect the significance of heritage assets, including their setting.</li> <li>5. <b>Local Sourcing of Materials:</b> On <b>Page 50</b>, they support the reference to local sourcing of materials and stress the importance of safeguarding these sources, particularly for repairs to heritage assets.</li> <li>6. <b>Overall Support with Recommendations:</b> While they find the document helpful and supportive of its overall contents, Historic England recommends including more detail to ensure that the <b>requirements of the historic environment</b> and the <b>protection of heritage assets</b> are fully assured.</li> </ol> <p>These recommendations focus on ensuring heritage assets are carefully considered in the SPD, especially in relation to renewable energy, local materials, and compliance with existing legislative and policy frameworks.</p>	<p>The comments are noted. A new paragraph (129) has been added to emphasise the importance of considering the impact on the historic environment when assessing the use of renewable energy sources.</p>

<p>Awsorth Parish Council</p> 	<p>The Parish Council welcomes the Carbon SPD and consider the document to be comprehensive and generally very clear and informative.</p> <p>They state it is unfortunate that Broxtowe is significantly less well placed on planning policy terms than Nottingham City in its efforts to lower carbon emissions from new developments. The situation appears to be made worse by the fact that in Nottingham City, carbon emissions from buildings represent 25% of the total carbon emissions of the city, and in Broxtowe Borough they represent 34%. They agree that it is essential that new buildings do not add to the carbon deficit of the councils, as carbon reductions are required across all sectors, including buildings to meet the net zero targets of the councils. However, it is not made clear whether or when Broxtowe might intend to bridge this significant policy gap.</p> <p>It is considered that the contribution made by blue roofs could be more clearly and consistently explained.</p>	<p>The support for the document is noted</p> <p>The SPD is based on existing planning policies. The Councils are currently working jointly to produce the Greater Nottingham Strategic Plan which will provide a more consistent policy base to secure lower carbon emissions from new developments.</p> <p>Additional reference to blue roofs has been added (para 79).</p>
<p>Bramcote Neighbourhood Forum</p> 	<p>The forum considers development should be designed to avoid dependency on car transport. The proposals to build houses on green belt simply to raise funds for a road that will add to congestion in the A52 is but one example. Better designed development will deliver huge carbon savings.</p>	<p>Comments noted.</p>
<p>Chetwynd Neighbourhood Forum</p> 	<p>The forum welcomes the principles contained within the SPD for improvements in sustainable development. They believe the SPD will complement the policies of the adopted Neighbourhood Plan, and the ambition for major development within their Area to be energy positive (or at least neutral), and the aspirations for a local energy network to benefit the local community.</p>	<p>Comments noted.</p>

<p>Climate Change Manager, Broxtowe Borough Council</p> 	<p>The document is a step in the right direction when it comes to reducing carbon emissions across the Borough.</p> <p>Permeable paving, surface run-off management, SUDs, and alternative attenuation are not included in the content of the SPD but are considered essential for developments in the area.</p>	<p>Comments noted and additional section has been added relating to drainage (section 2.9).</p>
<p>Agent (Bradley)</p>	<p>They consider that to impose standards that are beyond current Building Regulation requirements is unnecessary because planners are not qualified to comment on or advise about building construction techniques. The SPD will over complicate the planning process and require the submission of expensive and complex reports which cannot be assessed at officer level and will require external consultants or creating a new post. This will cause huge delays in applications, misunderstandings and frustration amongst applicants, increase the cost of applications and simply slow down applications and deter developers.</p> <p>They also note that many planning applications pre-date Building Regulations submissions, which might only be made up to three years later therefore will be asking for construction information at the planning stage which might not be available or expedient to provide at an early stage in the process.</p> <p>They suggest a nationwide adoption would be essential to avoid the different validation requirements.</p>	<p>Comments noted.</p> <p>The SPD provides guidance regarding what should be included within Sustainability and Energy Statements and Site Waste Management Strategies which are existing validation requirements.</p> <p>While it is recognised that detailed construction information may not always be available at the planning stage, the SPD encourages applicants to provide as much relevant detail as possible to demonstrate how key issues, such as compliance with sustainability and design requirements, will be addressed. This approach ensures that planning decisions are informed by an understanding of the development's potential impacts and proposed mitigations.</p> <p>The SPD has been produced by the Councils to set out local requirements based on existing Local Plan policies.</p>
<p>Agent (Dance)</p>	<p>They do not consider that standards should be imposed that are beyond current building regs requirements as planners are not qualified to comment on or advise about building construction techniques. They</p>	<p>Comments noted. The SPD provides guidance regarding what should be included within Sustainability and Energy</p>

	<p>consider this will over complicate the planning process and require the submission of expensive and complex reports about the subject when considering applications. Need to work on a national basis to not cause division in the process when creating competing requirements over different areas.</p> <p>This will cause huge delays in applications, misunderstandings amongst applicants, increase the cost of applications and simply slow down development.</p> <p>They note many planning applications pre-date Building regs submissions, which might only be made up to three years later- so will be asking for construction info at the planning stage which might not be available.</p>	<p>Statements and Site Waste Management Strategies which are existing validation requirements.</p> <p>While it is recognised that detailed construction information may not always be available at the planning stage, the SPD encourages applicants to provide as much relevant detail as possible to demonstrate how key issues, such as compliance with sustainability and design requirements, will be addressed. This approach ensures that planning decisions are informed by an understanding of the development's potential impacts and proposed mitigations.</p>
Carney Sweeney on behalf of Peveril Securities Limited and Omnivale Pension Scheme	<p>The draft SPD is appreciated for providing guidance on reducing carbon emissions without introducing new targets. The clarity it offers for planning applications is welcomed.</p> <p>The SPD's focus on the built form, rather than sustainable transport and flooding, is supported as it is seen as the area with the most potential for carbon reduction.</p> <p>However, they request clarification relating to:</p> <ul style="list-style-type: none"> <li>○ Local validation requirements and exclusions in Table 1 of the draft SPD due to inconsistencies.</li> <li>○ Consistency in document titles and updates to the Councils' Validation Checklists.</li> <li>○ Acknowledgment that the level of detail in applications may vary between full and outline applications.</li> <li>○ Confirmation on whether there is a Council-run fund for carbon offsetting.</li> </ul>	<p>Supportive comments noted.</p> <p>The validation requirements have been simplified to match Council validation checklists.</p> <p>Detail added to state that the level of detail required is dependent on the type and size of development proposed.</p> <p>The Councils currently do not have a Council-run fund for carbon offsetting. References have been removed as it is not anticipated the Councils will run a fund.</p> <p>Clarification has been added regarding the version of the NPPF being referred to, with references updated to the 2024 version.</p>

	<ul style="list-style-type: none"> <li>Clarification regarding the version of the NPPF (2023) being referred to.</li> </ul> <p>They also refer to their client's vision for development at Nuthall Park 26 in terms of carbon zero and carbon impact offsetting and how specialist carbon zero consultants have been instructed.</p>	
Pegasus Group Ltd on behalf of Bloor Homes	<p>They state the wording in ACS Policy 1 'have been minimised' is imprecise as there is no clear threshold for compliance with the policy. The policy does not include a clear specific target which has been justified by evidence. This imprecise wording means that there is not a clear platform on which to inform any guidance in the SPD.</p> <p>They also consider that the evidence basis for Policy 1 is out of date particularly as it regards viability considerations and this weakens the purpose of any guidance within the SPD.</p> <p>They refer to the Inspector's report and state that the intention behind the policy was not to introduce new standards with regard to reductions in climate targets as the policy is predicated upon meeting national standards.</p> <p>The feel that with the SPD providing targets and metrics which are not included within the parent policies, the SPD is going beyond guidance and beyond the remit of an SPD by introducing policy. Targets or metrics which have potential to affect development costs should be tested through evidence and examination of a Development Plan Document.</p> <p>Have undertaken an analysis of a number of planning applications determined by Broxtowe Borough Council and the analysis of schemes</p>	<p>The SPD provides guidance regarding what should be included within Sustainability and Energy Statements and Site Waste Management Strategies. It seeks to provide guidance regarding what information should be provided within these documents and provides examples of best practice. Specific targets are based on existing policy requirements or existing building regulations and therefore do not add additional development costs.</p> <p>The SPD seeks to provide clear guidance to officers and developers which can then be referred to within reports for determining future planning applications.</p> <p>It is considered that the SPD has been prepared within the scope of SPDs as stated within "The Town and Country Planning (Local Planning) (England) Regulations 2012". Specific targets are either stated as best practice or are based on existing policy requirements.</p> <p>Broxtowe considers that there is a need to provide greater clarity through the SPD to ensure that decision makers and</p>

	<p>that have granted planning permission show that sustainability statements that are submitted along with planning applications have not gone beyond Building Regulations. Furthermore, analysis of the way Broxtowe Borough Council has assessed compliance with the Policy shows limited or no reference in Planning Committee reports and no conditions relating to the sustainability of the new buildings. State that this demonstrates that decision makers in Broxtowe consider that just meeting Building Regulations is sufficient to comply with Policy 1 of the ACS.</p> <p>Consider that if Broxtowe wish to introduce specific new standards in the sustainability of new development then this should be through a Development Plan Document</p>	<p>applicants are clear in respect of policy requirements and what is expected to be submitted within a Sustainability and Energy Statement and in a Site Waste Management Strategy,</p>
Resident	<p>On page 10 with regard to building re-use &amp; retrofit there is a query whether Policy CC1 should also not apply.</p>	<p>Yes, it is agreed that this should be ticked on table 2.</p>
Resident	<p>The resident states the SPD is a useful document and that they are largely in agreement with the sentiments and detail of the document.</p> <p>However, there should be more reference to the use of BREEAM standards.</p> <p>They state that ground source heat pumps should be stated as being preferable compared to air source heat pumps as they are more efficient, less noisy and less intrusive in their opinion. Disagree with the suggested provision of Air Sourced Heatpumps (ASHP) particularly in developments of over 10 homes. The outside unit of ASHPs can be noisy (and will get more so as they get older) Ground or Water source heatpumps should be the only allowable form of heatpumps for new developments. GSHPs with shared ground source are perfectly feasible and should be the preferred solution for heatpumps.</p> <p>They also state that consideration needs to be given to the need to "cap" energy costs for District Heat Networks which are not included in the existing price capping schemes.</p> <p>Household Energy Storage should be included as well as site-wide.</p>	<p>References to BREEAM are made throughout the document.</p> <p>Such technologies are evolving all the time, and it would be inappropriate to restrict which should be preferred type of heat pump is this will vary by scheme.</p> <p>The ability to "cap" energy costs for District Heat Networks is outside of the scope of the SPD.</p> <p>Reference added to considering household energy storage (para 133).</p> <p>Best practice text has been amended to refer to all buildings rather than just 1 and 2 storey.</p> <p>The Sustainability Checklist reflects the existing policy basis of both councils.</p>



	<p>This can be used both to store energy generated for PVs and to be charged "overnight" to smooth demand on the grid infrastructure.</p> <p>In relation to paragraph 129, many modern homes are 3 storeys and should also be required to have sufficient roof space for PV.</p> <p>In relation to the Sustainability Checklist, questions why checklist elements (other than the connection to the District Heating Network) do not apply to Broxtowe.</p> <p>However, do not agree with the wholesale adoption of LETI proposals, particularly with respect to window size (Section 2.3). Whilst Global Warming in itself seems to be accepted, the impact upon the UK climate is less clear. To therefore limit the size of windows on the assumption of increased solar gain could be counter-productive.</p> <p>Paragraph 57 needs to make it clearer that the wall-to-window ratio includes window reduction by external blinds as well as a straightforward window size. Large (well insulated) windows with external moveable blinds should be encouraged to increase the amount of natural daylight available. The inclusion of wall-to-window ratios without that proviso will encourage architects and developers to create small windows making the rooms dark particularly in the present preference for open plan living.</p>	<p>The references to LETI provides examples of best practice rather than specific requirements.</p> <p>The SPD now includes references to considering the use of external moveable blinds in order to maximise internal light whilst preventing overheating.</p>
Resident (	<p>The resident is fully in favour of Roof Top Solar PV Cells as climate change is resulting in extra rain. They state that new housing estates should not be built on land that could in the future cause or be at risk of flooding.</p>	Comments noted.
Resident	<p>Question the declaration of a climate emergency and the evidence underpinning it.</p> <p>Raise issues regarding HS2 safeguarding and compensation that there are more pressing issues than climate change.</p> <p>The resident also refers to the use of small modular reactors and thermal banking bases and focussing green energy renewables to a</p>	<p>The Councils have separately published information in respect of declaring climate change emergencies.</p> <p>Issues related to HS2 and housing need are not specific matters dealt with in this SPD.</p>

	<p>Toton site business park as well as a rail terminal. The existing planning policy should also be watered down.</p> <p>They consider passive design should be promoted but not enforced under 160 dwellings as this would be uneconomic. Heat exchangers are required to avoid humidity and mould. Should not be a local validation requirement for 'medium sized developments'.</p> <p>They also consider wood buildings should be permitted if research shows they are fire safe.</p> <p>Overall they consider it is better to focus on increasing housing rather than planning requirements.</p>	<p>The SPD does not seek to set out specific requirements for existing site allocations.</p> <p>It is considered the requirements within the SPD are based on existing policies and would not impose an unacceptable burden on medium sized developments.</p> <p>Wood buildings would be considered acceptable in principle, subject to other issues being considered as part of an application.</p>
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