



South
Northamptonshire
Council

Energy and Development Supplementary Planning Document

Adopted March 2007

REPORT ON CONSULTATION AND PUBLICITY RESPONSES TO REPRESENTATIONS CHANGES TO DRAFT

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Introduction

The SPD has been jointly prepared to assist in the delivery of specific policies from the development plan covering Daventry District and South Northamptonshire, namely Northamptonshire County Structure Plan (Adopted March 2001) Policies GS5 and EN1. The SPD provides detailed guidance on the implementation of these policies.

The SPD will be taken into account during consideration of planning applications.

The Councils approved the draft SPD for the purposes of consultation in November 2006.

Consultation

Commencing on 24 November 2007 over 700 letters and emails were sent to organisations, town and parish councils and individuals who were listed on the Councils' database.

Publicity

The draft SPD was posted on the planning consultation section of the Councils' websites.

The Councils placed advertisements in the Daventry Express, The Northampton Chronicle and Echo and the London Gazette. A copy of the advertisement is included at Appendix A.

Consultation Period

Consultation took place with organisations and local residents on these documents for a period of 6 weeks until 4.30pm on 12th January 2007.

Comments received.

29 organisations and individuals responded to the consultation. Appendix B contains a summary of all the representations. Copies of the full representations can be viewed at the Council's offices by prior appointment.

Consideration of Responses

The representations were reported to Daventry District Council's Strategy Group on 15th February 2007 and Full Council on 1st March 2007. South Northamptonshire Council dealt with the consultation draft SPD through delegated powers. The Councils agreed a response to each of the comments and agreed, where appropriate, changes to the document in response to the comments. On 1st March 2007 Daventry District Council and on 27th March 2007 South Northamptonshire Council resolved to adopt the Energy and Development SPD.

Advertisement

DAVENTRY DISTRICT COUNCIL & SOUTH NORTHAMPTONSHIRE COUNCIL

PLANNING AND COMPULSORY PURCHASE ACT (2004)

ENERGY & DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT (SPD)(CONSULTATION DRAFT) AND SUSTAINABILITY APPRAISAL (CONSULTATION DRAFT)

Daventry District Council and South Northamptonshire Council have jointly produced a draft Energy & Development Supplementary Planning Document and accompanying draft Sustainability Appraisal.

Daventry District Council and South Northamptonshire Council have resolved to invite comments on the documents. The SPD, when adopted, will supplement the policies and proposals of the Local Plan/ Local Development Framework. It sets out how the Councils expect to see development designed with energy efficiency and renewable energy in mind and will be taken into account by the Councils when considering planning applications. The accompanying Sustainability Appraisal provides an analysis of sustainability issues relevant to the SPD.

The Councils welcome comments from any interested party on the documents. The documents will be available during the consultation period for inspection during office and library hours in:

A) Daventry District at:

- Daventry District Council, Lodge Road, Daventry;
- the libraries at Daventry, Moulton, Kingsthorpe, Long Buckby, Woodford Halse and Brixworth; and the
- Council's Outreach Centres at Woodford Halse, Brixworth and Long Buckby

B) South Northamptonshire at:

- South Northamptonshire Council Offices, Springfields, Towcester [Planning Reception];
- Brackley Tourist Information Centre;
- Towcester Town Council and Brackley Town Council;
- the libraries at Towcester, Brackley, Roade, Middleton Cheney, and Deanshanger

A copy will also be available on the Councils' websites www.daventrydc.gov.uk/atoz/planning1/consult.shtml and www.southnorthants.gov.uk

Comments, which must be in writing, should be forwarded to John Mooyman at South Northamptonshire Council, Springfields, Towcester NN12 6AE, or by e-mail at: planning.policy@southnorthants.gov.uk by **4.30pm on 12th January 2007** at the latest. Comments cannot be accepted after this time.

Simon Bovey, Executive Director, Daventry District Council
Richard Fox, Head of Planning and Leisure, South Northamptonshire Council

Responses to Consultation

Compiled by South Northamptonshire Council on behalf of both Authorities and with the responses agreed with Daventry District Council

Organisation	Comment	Council Response
Network Rail	No comments	Noted
Scaldwell Parish Council	No comments	Noted
Equal Opportunities Commission	No comment	Noted
Anonymous	Supports the SPD	Noted
Gayton Parish Council	<ul style="list-style-type: none"> (i) nuclear power stations are the only answer to ensuring future energy needs (ii) all new houses should be built with every energy saving device possible as per Scandinavia standards, carbon neutral if possible (iii) rainwater collection should be included (iv) installing energy efficiency measures is expensive and grants should be available 	<ul style="list-style-type: none"> (i) this lies outside the remit of local authorities. No change to the text (ii) the SPD works towards this aim (iii) this will be part of an SPD on wider sustainability issues to be prepared in due course (iv) the SPD contains information on who to contact for up-to-date grant advice – no change needed
Councillor Walduck (DDC)	<ul style="list-style-type: none"> (i) Bio fuels can produce smoke and fumes. (ii) Micro wind turbines and solar panels not sustainable in the British climate. Council should issue literature on the wider costs of these technologies (iii) disposal of turbines and panels should be addressed 	<ul style="list-style-type: none"> (i) Any plant burning fuels will be subject to environmental regulations regarding nuisance and health. No planning action required. (ii) Not a planning issue, no action (iii) this can only be controlled in planning terms by conditions requiring removal once the life or use of the installation has come to an end where planning

		permission is required in the first place. Amend SPD accordingly
Walgrave Parish Council	<ul style="list-style-type: none"> (i) There are no examples of no carbon houses in the UK but many in Scandinavia (ii) document could be shortened to indicate that residential carbon emissions should be reduced to 1 tonne per dwelling by 2050 (iii) the draft SPD contained too much information for the building industry (iv) targets are too complacent, should aim for 10% of dwellings to be zero carbon by 2008 (v) should introduce car free areas 	<ul style="list-style-type: none"> (i) The SPG is intended to steer development towards this goal (ii) the SPG should help achieve this goal (iii) the SPD contains only a small amount of information (and regulation) available on this subject to developers (iv) The draft asked what consultees felt the targets should be – it highlighted what the minimum starting point for discussion on this issue would be. The SPD will set targets in the light of consultation responses and further research by officers. (v) amend the SPD to include this possibility
Alderton Parish Meeting	<ul style="list-style-type: none"> (i) care needs to be taken with commercial bio-mass plants in rural areas, should be on industrial areas (ii) document should emphasis energy saving (iii) document seems to be voluntary, there should be a planning requirement (iv) water conservation is not included 	<ul style="list-style-type: none"> (i) rural bio-mass plants are located in rural areas to be near the source of their fuel. Planning applications will have to justify the location on these grounds. Amend text to highlight this issue (ii) a large section of the document is devoted to this (iii) The draft contained a section on what targets we should set. This will be a requirement in the final document (iv) water conservation will be included in a wider sustainability SPD to be prepared in due course
Peacock and Smith representing Wm. Morrison Supermarkets	<ul style="list-style-type: none"> (i) objects to 10% of energy being provided through renewables, refer to PPS22 (ii) SPD should not set targets above the Building Regulations 	<ul style="list-style-type: none"> (i) requirements will be derived from DCLG documents: draft PPS1 Planning and Climate Change, draft document Building a Greener Future and the Code for Sustainable Homes. (ii) Building Regulations are a minimum standard. Refer to (i) above.
Litchborough Parish Council	(i) it will be onerous for developers to submit specialist technical detail at the application stage should only have to	(i) the SPD contains matters that are not covered by building regulations and such statements are required by Government guidance

	submit building regulations	
Eydon Parish Council	(i) it will be onerous for developers to submit specialist technical detail at the application stage should only have to submit building regulations	(i) the SPD contains matters that are not covered by building regulations and such statements are required by Government guidance
East Midlands Regional Assembly	(i) Policies 40 and 41 of the RSS8 cover energy reduction and efficiency, and renewable energy	(i)The SPD highlights these policies in Appendix A
Kember Loudon Williams Ltd Representing Capel House Property Trust Ltd.	(i) travel plans are not suitable for large residential areas (ii) combined heat and power schemes need leadership in their implementation, WNDC should be identified in this role (iii) energy efficient orientation may conflict with other urban design	(i) the text does not refer to travel plans for residential areas (ii) Amend text to include this possibility (iii) The text states that certain orientation is an aim, not a requirement, however text will be further clarified. Amend text
Councillor Mrs Sally Townsend (SNC)	(i) building orientation should take advantage of the sun's heat and CO ² emissions reduced, and use of renewable energy and building materials should be encouraged	(i) the SPD covers these issues except building material. The text can be amended briefly to include building material. Amend text
STOP the Over-Development of Northamptonshire	(i) Objects to the over-development of Northampton (ii) These developments are entirely unsustainable	(i/ii) Not within the remit of the SPD, relate to national policy objectives
English Heritage	(i) There are exceptional cases where a scheduled monument would require Scheduled Monument Consent. Planning permission would be needed for renewable energy installations.	(i) Amend text to mention this
Anonymous	(i) Use illustrations of Insulated Cavity wall construction. Solid floor insulation	(i) Ideas will be considered (ii) The SPD highlights that it cannot cover ever topic in

	<p>details. Types of condensing boilers. Thermostatic valves.</p> <p>(ii) Traffic volume is not energy efficient.</p> <p>(iii) Every residential planning application must include an energy efficiency document is critical.</p> <p>(iv) Concerns of visual impact of wind farms. The high installation costs and minimum return in electricity</p> <p>(v) Planning restrictions should be imposed on four storey residential developments, which cannot be as energy efficient as a two storey unit.</p> <p>(vi) Exhibition of houses constructed to provide energy efficient units for the 21st Century. A similar exhibition was held in the mid 1980's at Milton Keynes</p>	<p>detail connected to energy. Traffic will be considered as part of a more general sustainability SPD in due course</p> <p>(iii) Required by the SPD</p> <p>(iv) Government guidance requires that no energy source is precluded by planning policy</p> <p>(v) The number of storeys does not correlate with how energy efficient a building is – efficiency is based on how a building is constructed e.g sufficiently insulated etc.</p> <p>(vi) Comment Noted</p>
<p>Daventry and District Civil Society</p>	<p>(i) Planning permission only to be granted in the applicant provides an Energy Efficiency Statement that, states how a development will be efficient and includes details of renewable energy used.</p> <p>(ii) Solar panels, listed building consent needed and planning permission for conservation areas.</p> <p>(iii) Wind turbines, small scale buildings planning permission is required. Listed building consent if necessary. Large scale Wind turbines need planning</p>	<p>Points are all covered in the SPD</p>

	<p>permission.</p> <ul style="list-style-type: none"> (iv) Planning permission or listed building consent for heat pumps. (v) Biomass - Must comply with building regulations or listed building consent. (vi) Energy information pack with all development. (vii) Policy should be to reduce energy use and increase renewable energy use. Regional policy should promote this. (viii) A rated boilers and energy saving lightbulbs save energy. (ix) Orientation of buildings is a key design. Terraced developments in curves maximises warmth. (x) Developments should be visually appealing. (xi) Measures for planning against crime. (xii) Give priority to transport other than cars. (xiii) Civic society would like to contribute to all future stages of the energy efficiency initiative. 	
National Trust	<ul style="list-style-type: none"> (i) Include illustrations of Windermere, Stamford Brook and Gibson Mill (ii) Para 1.4 is unclear wording covering extensions to existing buildings. Suggest “including the 	<ul style="list-style-type: none"> (i) Noted and will be considered (ii) Amend text (iii) Amend text, but keep it general and relating to both you and your development. (iv) Relevant photos to be sourced.

	<p>conversion and/or extension of existing buildings”</p> <p>(iii) Section 2 well written. Para 2.1 ‘<u>Your</u> use of energy impacts upon the environment’ and then moves to the national/global picture, it would be helpful if it was bought back to the individual at the end of the section. Eg. ‘This includes advice on how your home and place of work can contribute to improved energy performance’.</p> <p>(iv) Include photos of flooding in Northants.</p> <p>(v) Para 4.2 to be moved and become the first part of a 6 Step process in ‘planning and development’. Step 3 could be titled ‘Characteristics of Site Location’</p> <p>(vi) Step 1. Possibly add at the end ‘Similar considerations apply to domestic development and the potential of under-used spaces should be fully explored’.</p> <p>(vii) Step 2. end of first sentence suggest ‘will often be the best option’. Last sentence needs a comparison. Eg. ‘this improves the energy conversion by around X%’ or ‘this improves the energy conservation from around X% to 85%’</p>	<p>(v) It is not the intention to raise transport in this document in great detail. This issue will be picked up in the proposed SPD Sustainable Development, which will be prepared in due course. It is not felt necessary to re-title this.</p> <p>(vi) Amend text</p> <p>(vii) Amend text</p> <p>(viii) Amend text to identify solid blockwork as an example. Timber is not as good re- its insulating properties.</p> <p>(ix) Amend</p> <p>(x) This will be clarified</p> <p>(xi) This may not be realistic as supplies on site may not be sufficient</p> <p>(xii) Text error acknowledged – this will be replaced by new policy and targets</p> <p>(xiii) Amend text</p> <p>(xiv) Amend text</p> <p>(xv) Amend text for consistency between both sections</p> <p>(xvi) Amend text with new targets</p> <p>(xvii) For reference BREEAM is being replaced with the Code for Sustainable Homes</p> <p>(xviii) Amend text with new targets</p> <p>(xix) Amend text with new targets</p> <p>(xx) Comment welcomed</p>
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	<ul style="list-style-type: none"> (viii) Step 5 – the advice on the use of heavy blockwork arguably requires some clarification. Timber can also provide opportunities for insulation. (ix) Para 5.1. Would read better if it started ‘Renewable energy <u>comprises</u> those energy sources’. Third sentence is ambiguous with ‘can be’. (x) Windturbines. It should be clear that wind turbines are now available that can be used for domestic properties. (xi) Para 5.45. Use of wood burning boilers when timber is felled ‘on site’. (xii) Para 6.3. Reference should be to BREEAM. (xiii) Para 6.8. Agrees with ‘exception’ in relation to the historical environment. Installations should be ‘reversible’. (xiv) Para 6.9. 4th sentence should also require that landscape character is respected and reinforced. 5th sentence – advice here appears to be at a variance with the earlier in the document (p13-14) that ‘All developers are required to provide a net gain in habitats and/or species contained in the Northamptonshire Biodiversity 	
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	<p>Action Plan'. The specific reference to 'settings' in this sentence is very important and must be retained (without this the SPD would not be consistent with national and regional planning policy).</p> <p>(xv) Para 6.11. 'all new development'? or should it be 'all new buildings' ie, is it intended to also apply to all changes of use and to all extensions.</p> <p>(xvi) The requirements need to be related to the scale/form of development. It is considered that it will be difficult, for example, to justify requirements in respect of house extensions. Similarly the larger the scale of new housing developments the greater the expectations should be.</p> <p>(xvii) BREEAM is appropriate for new development.</p> <p>(xviii) The 10% renewable target needs to be related to the scale of development eg. For 10 dwellings or more, or specified floorplan.</p> <p>(xix) 10% is reasonable figure.</p> <p>(xx) The National Trust support the energy SPD.</p>	
NBC	(i) The general document lacks evidence-based information on	(i) The document is intended to provide general advice re- energy technologies and set specific targets in

	<p>energy use assessment for both Daventry and SNC. There are no situational analyses on production and consumption patterns.</p> <p>(ii) The document looks like a National consultation document than a local document. Could you give it a local character.</p> <p>(iii) Try to integrate the Climate Change concerns into the consultation document.</p> <p>(iv) Under section 2.10 Could you add change in production and consumption patterns just after increasing the proportion of renewable energy?</p>	<p>relation to national guidance.</p> <p>(ii) This issue has been queried with NBC and addressed as (i) above.</p> <p>(iii) the document already does this</p> <p>(iv) Amend text</p>
Croudace Strategic Ltd	<p>(i) If the EcoHomes rating system is still considered relevant, we feel that the recommended BREEM standard should be bought in line with Policy 3 set out in the Draft East Midlands Regional Plan.</p> <p>(ii) It is considered impractical for an Energy Efficiency Statement to accompany all planning applications. It should only be submitted at the detailed planning stage</p>	<p>(i) Amend text with new targets</p> <p>(ii) Needs to be included at the outline stage for development control reasons</p>
Northamptonshire County Council	<p>(i) Clear and useful</p> <p>(ii) The role the SPD will play in the LDF has not been properly thought out (relationship with</p>	<p>(i) Noted</p> <p>(ii) This will be further clarified in the text - will supplement the LDD which the WNDC will have to refer to</p>

	<p>WNDC and Core Strategy)</p> <p>(iii) Covers matters that are the responsibility of the waste planning authority.</p> <p>(iv) Repeats national consideration without giving local perspectives in relation to land use planning.</p> <p>(v) It covers South Northants and Daventry but not NBC.</p> <p>(vi) The SPD ties to the Structure Plan policies GS5 & EN1, that are due to expire on 28/9/07.</p>	<p>(iii) Amend text to refer to the Local Waste Plan</p> <p>(iv) Adequately addresses local needs given national policy</p> <p>(v) NBC were invited to be involved, but did not wish to</p> <p>(vi) Need to ensure energy issues are covered in the the: LDF/Core Strategy</p>
RPS	<p>(i) Section 3 is deleted from the SPD. It is consumer advice and should be in a separate brochure.</p> <p>(ii) Step 2 of Section 4 should be deleted. It suggests that Combined Heat and Power is the only valid renewable energy for larger developments.</p> <p>(iii) Section 5. Para 1.8 Information on renewable technologies can be made available in a separate brochure that can be updated regularly.</p> <p>(iv) Section 6 should form the basis for the SPD. The SPD should recognise the Code of Sustainable Buildings coming out in April 2007. SNC should seek achievement of BREEAM that is “very good” instead of “excellent”.</p>	<p>(i) This section also applies to developers. Amend text to clarify this</p> <p>(ii) The text refers to this as being an option</p> <p>(iii) The SPD aims to highlight all relevant energy options within one document i.e reference point, rather than create numerous documents</p> <p>(iv) Draft supplement to PPS1 allows planning authorities to aim for higher levels in the Code for Sustainable Homes</p>

	<p>The SPD's 10% renewable energy target should be deleted as the SPD should not be a policy decider. This also applies to reducing CO² emissions by a further 10%.</p>	
Nathaniel Lichfield & Partners	<ul style="list-style-type: none"> (i) Para 6.3. Do not agree with minimum BREEAM standard requirements of excellent. Should be more flexible. (ii) Para 6.4. Not reasonable that all planning applications should submit an Energy Efficiency Statement. Should be provided at the detailed planning stage. 	<p>(i) Amend text with new targets</p> <p>(ii) Needs to be included at the outline stage for development control reasons</p>
Environment Agency	<ul style="list-style-type: none"> (i) Details a positive approach being taken by SNC & DDC. (ii) Should include water efficiency measures. (iii) Section 3 should include the potential use of green roofs. (iv) Section 4. The opportunity to showcase new measures in developments should be promoted to developers with this section. (v) Ground Source Heat Pump- We should control thermal discharges with an appropriate permit. 	<ul style="list-style-type: none"> (i) Noted (ii) Will be included in a more general SPD on sustainability (iii) Amend text to include (iv) Amend text (v) The technology does not produce thermal discharge in to an aquatic environment.
Weedon Bec Parish Council	<ul style="list-style-type: none"> (i) There should be local planning policies for each specific council. (ii) Some overlap of boundaries 	<p>(i) The 2 Councils have similar issues/concerns re-energy and jointly developed guidance/policies are therefore a positive way to address this</p>

	<p>need to be dealt with within a joint Local Spatial Policy to prevent difficult/planning issues in the future</p> <p>(iii) Each area should have a local planning policy which reflects Energy Conservation outside the WNDC Development Areas</p> <p>(iv) Planning policy should reflect the requirements of all types of smaller applications...</p> <p>(v) The types of conservation methods considered suitable to include within certain areas eg, wind turbines, single household wind turbines, water, solar panels.</p> <p>(vi) Offer of grants as incentives.</p> <p>(vii) Take into account rural areas not just development in Towcester and Daventry.</p>	<p>(ii) Noted</p> <p>(iii) Energy issues should relate to the whole area, not separated out as WNDC and non-WNDC areas</p> <p>(iv) The SPD will do this</p> <p>(v) The Government is positive about encouraging renewable energy therefore each application will be judged on its merits and within a broad framework</p> <p>(vi) Grants are referred to in the document</p> <p>(vii) The SPD covers both rural and urban areas</p>
English Nature	<p>(i) Support the SPD. Welcome the section on planning guidance for energy. Support requirement that where renewable energy systems have a negative impact on Northants BAP species developers will have to provide mitigation. However, it should include requirement to not only mitigate but provide a net gain in bio-diversity.</p> <p>(ii) Forward thinking design should provide tree planting in urban</p>	<p>(i) Noted – BAP requirement is already highlighted in the SPD</p> <p>(ii) Already highlighted in the SPD</p>

	areas which would increase the amount of shade and reduce urban ambient temperatures.	
Hartwell Parish Council	<ul style="list-style-type: none"> (i) Add some more colour to the SPD. Should explain what an SPD is and its role. The photo on page 17 is taken from too far away. (ii) A sample of illustrations regarding the benefits of energy saving and the detriment in terms of carbon emissions would be useful. (iii) Section 5 is good particularly on ground source heat pumps. (iv) BREEAM is an excellent minimum requirement. 	<ul style="list-style-type: none"> (i) Graphics are being reviewed – SPD context is already highlighted (ii) ditto above (iii) Noted (iv) Amend text with new targets