

**SALFORD CITY COUNCIL**  
**SUPPLEMENTARY PLANNING DOCUMENT**  
**SUSTAINABLE DESIGN AND CONSTRUCTION**

**January 2008**

**STATEMENT OF MAIN ISSUES RAISED IN REPRESENTATIONS**

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)  
REGULATIONS 2004  
**Regulation 18(4)(b)**

## **1. Introduction**

Under the Town and Country Planning (Local Development) (England) Regulations 2004, it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents including Supplementary Planning Documents (SPDs). This is a reflection of the Government's desire to 'strengthen community and stakeholder involvement in the development of local communities'.

This document is a statement of the main issues raised in representations about the draft Supplementary Planning Document on Sustainable Design and Construction, and how those issues have been addressed in the SPD. It is prepared under Regulation 18(4)(b) of the aforementioned Regulations. This statement also incorporates details from the previous consultation statement, published in September 2007, under Regulation 17(1), which details the consultations that were carried out in the preparation of the draft SPD.

In due course, the Council will be adopting a Statement of Community Involvement (SCI) that will set out how the public will be consulted on new planning policy and significant planning applications. Once the SCI is adopted, which is due to be in March 2008, planning documents will be required to conform to its provisions.

This Consultation Statement has been prepared in advance of the adoption of the SCI, but aims to reflect the intentions of Government planning guidance for reporting on community involvement in the Plan making process. It describes the involvement of stakeholders in the preparation of the Sustainable Design and Construction SPD.

The consultation process adopted meets both the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 and the gold standards in community involvement devised by Partners IN Salford.

## **2. Gold Standards IN Community Involvement**

Partners IN Salford (Salford's Local Strategic Partnership) have devised 5 aspirational standards for community involvement and all partners of the Council are signed up to delivering community involvement in this way ([www.partnersinsalford.org/communityinvolvement](http://www.partnersinsalford.org/communityinvolvement)). The Gold Standard is a goal for partners to aim towards, particularly where there is activity or proposed change within the City that will have a significant impact upon local communities. They are:

- 1) Value the skills, knowledge and commitment of local people.
- 2) Develop working relationships with communities and community organisations.
- 3) Support staff and local people to work with and learn from each other (as a whole community)
- 4) Plan for change with, and take collective action with, the community.
- 5) Work with people in the community to develop and use frameworks for evaluation.

### 3. Background

The city council has commissioned Urban Vision Partnership Ltd to produce an SPD for Sustainable Design and Construction. The objective of the SPD is to provide additional guidance for developers on the integration of sustainable design and construction measures in new developments, including energy efficiency, rainwater recycling, and the provision of waste recycling facilities.

Urban Vision has led the ongoing consultation exercise that underpins the process of formulating the policies contained within the SPD.

### 4. Initial Process of Consultation

A number of consultation exercises were undertaken prior to the preparation of the consultation draft SPD, in order to:

- Determine what guidance additional to UDP Policies ST16 and EN22 should be incorporated into the SPD to ensure that appropriate sustainable design and construction measures are integrated into new developments;
- Establish what sustainable design and construction measures should be encouraged/required in the SPD;
- Establish what requirements can be sought without placing an undue burden on developers and, as a result, compromising the viability of developments;
- Establish the overriding concerns of local communities with regards to minimising the impact of large developments (of more than 100 dwellings or 5,000 square metres of floorspace) on the conservation of non-renewable resources, and on the local and global environments and ensuring that full consideration has been given to the use of renewable energy options, where practicable.

To realise these aims of the consultation process, a series of workshops were organised with developers, major house builders, architects, planning consultants, green/environmental groups and community representatives. Representatives from the council's design team and environment and projects group also attended these meetings.

To build upon this initial input, a short document and accompanying questionnaire were sent to representatives of Salford's eight Community Committees and the people who had registered an interest in the document. These were also distributed to green/environmental groups who were unable/unwilling to attend one of the workshops.

#### **Primary User Event**

A primary user event was held on the 23<sup>rd</sup> February 2007 to inform the production of both the Sustainable Design and Construction SPD and the Design SPD. The event was attended by representatives from major developers, house builders, external members of the User Panel who frequently submit applications to the council, and representatives from a number of architectural practices and planning consultancies. Representatives of Salford City Council and Urban Vision also attend this event.

To inform the production of the draft Sustainable Design and Construction SPD, a series of workshops took place at this event. Attendees were split into groups to discuss issues pertinent to both the Sustainable Design and Construction SPD and the Design SPD. The workshops developed discussion based around a number of themes, including

- **What measures should be encouraged to minimise the risk of flooding in new developments?**
- **How can the SPD contribute to maximising water efficiency in new developments?**
- **To achieve the most sustainable solutions in new developments, what levels of standards should we aspire to? E.g. BREEAM excellent only.**

- **The Code for Sustainable Homes sets a target of all new homes to be carbon neutral by 2016. Is this a realistic aim?**
- **Should the SPD include a requirement for major developments to generate a percentage of its own energy demand through on-site renewables?**

The workshops lasted for approximately two hours. A summary of some of the main issues raised is set out below:

Comments Received	Council's Response
Developers need clear guidance to improve the sustainability of new developments	The SPD provides clear guidance on a range of measures that can be incorporated into new development.
The document should avoid the creation of an excessive 'shopping list' which could prove restrictive to good design	The SPD promotes buildings that are designed and constructed to minimise their environmental footprint, are economic to run over its whole life cycle, and fit well with the needs of the local community. It is recognised that a prescriptive document could restrict good design. Accordingly, the document does not prescribe particular technologies that must be incorporated into new developments and recognises that the approach to improving the sustainability of buildings will vary from project to project. The SPD does include standards that it should normally be practicable to achieve in new developments. However, it remains flexible in terms of how these standards are met.
Both developers and the general public need to be educated on the importance of improving the sustainability of new development.	Raising awareness about the importance of improving the sustainability of new development is an important aspect of the SPD.
What are the financial incentives to encourage developers to improve the sustainability of new development?	Many of the measures advocated in the SPD could reduce costs for developers. For example, by providing a system to manage material supply and waste, a SWMP can significantly diminish development costs by reducing the likelihood that materials will be over-ordered and decreasing the volume of waste that needs to be disposed. It is also important to recognise that well-designed developments which offer the occupants a comfortable living environment and protection from the risk of flooding are likely to be increasingly desirable as climate change progresses.
We need to make our existing building stock more sustainable.	Although this document is primarily concerned with improving the sustainability of future developments, it is recognised that the environmental performance of existing buildings is often very poor. Consequently, a section which encourages a range of measures to improve the sustainability of existing buildings has been incorporated into the SPD.  Furthermore, the city council intends to develop a Climate Change Strategy that may address some of these issues.

## **Consultation Workshop with Developers and Community Representatives**

A workshop was held on the 27<sup>th</sup> March 2007 at Emerson House, Eccles. The workshop commenced with a presentation from Urban Vision on behalf of the City Council, which provided an introduction to Salford City Council's UDP Policies on Sustainable Waste Management and Resource Conservation, before setting out the suggested scope and probable objectives of the Supplementary Planning Document.

The workshop then developed discussion based around a number of themes, including:

- **What measures can we realistically expect developments to incorporate to reduce the risk of flooding?**
  - What measures should be encouraged/required in the SPD? The use of SUDS? Compensatory flood storage systems? Infiltration devices (e.g. soakaways)? Green Roofs? Pervious surfaces?
  - Is there a need for additional guidance on these issues?
- **How can the SPD contribute to maximising water efficiency in new developments?**
  - What measures should be encouraged/required in the SPD?
  - Should applications for major development be required to undertake a rainwater and greywater use feasibility study and incorporate the technologies into proposed development when feasible?
- **Should the SPD incorporate guidance on the selection of sustainable construction materials?**
  - Should encouragement be given to use of materials that: are locally procured? Have a high thermal mass? Have a low embodied energy?
  - Could the SPD require major developments to use a certain proportion of materials that are derived from recycled content?
- **What measures should be encouraged in order to minimise the amount of waste generated during the construction process?**
  - Should there be a requirement for developers to produce a waste minimisation plan?
  - Should there be a requirement to identify resources already available on site that could be reused?
- **How can we 'design in' recycling facilities into new developments so that their use is encouraged?**
  - Should there be a requirement for all new non-residential developments (above a certain threshold) to provide a minimum recyclable waste storage space?
- **How can we maximise resource conservation through design?**
  - Should the SPD include a requirement for major developments to generate a percentage of its own energy demand through on-site renewables?
  - Should guidance be provided on other measures to improve energy efficiency, such as CHP and ground source heat pumps?
- **The Code for Sustainable Homes sets a target of all new homes to be carbon neutral by 2016. Is this a realistic aim?**
  - Can the SPD offer guidance to help to achieve these targets?
- **Do you have any particular concerns about the proposed contents of the SPD?**
- **Are there any issues that are not being covered that should be incorporated?**
- **Are there any examples of best practice that should be encouraged/highlighted?**

The workshop lasted for approximately two hours. A summary of some of the main issues raised is set out below:

Comments Received	Council's Response
<p>Compensatory flood storage – underground storage tanks can be used in residential developments but in high-rise developments the footprint is not large enough to allow meaningful collection. Would require oversized tanks and significant pipework in order to utilise effectively. It is easier to achieve higher rates of water attenuation on family housing sites.</p>	<p>The SPD recognises that the most suitable techniques to minimise the risk of flooding will vary between developments. It incorporates an expectation that in most instances it should be possible for developments to ensure that there is no net increase in the speed or volume of surface water run-off. However, the document does not seek to prescribe particular techniques that should be utilised but provides guidance on a range of measures that could be integrated into new development.</p>
<p>Developments in high flood risk areas should avoid ground floor habitable rooms</p>	<p>The SPD recognises the importance of incorporating guidance to minimise the impact of flood events. Accordingly, the document contains linkages to the Council's Flood Risk Guidance Note, which provides detailed guidance to ensure that development built in areas at risk of flooding in Salford is adequately protected from flooding.</p>
<p>High Rise buildings, those over 5 storeys, have particular difficulty in achieving water attenuation and water dispersal. Consequently, it may be necessary to avoid high rise development in the flood plain</p>	<p>The SPD incorporates linkages to the Council's Flood Risk Planning Guidance, which provides detailed advice to ensure that new development built in areas at risk of flooding in Salford is adequately protected from flooding and that the risk of flooding elsewhere is not increased as a result of new development.</p>
<p>Undercroft parking could be used in developments to provide space for floodwater storage.</p>	<p>It is recognised that measures to reduce the risk of flooding are often essential in areas deemed to be at risk. The council is currently preparing a Flood Risk Guidance note which offers advice on flood risk mitigation measures that new development should incorporate to manage flood risk to an acceptable level. Links to this Flood Risk Guidance have been included in the draft SPD.</p>
<p>Even if a development achieves a high rate of water attenuation at the time of construction there is a risk that it could be jeopardised by other developments that increase run off.</p>	<p>The SPD provides guidance on minimising the speed and volume of surface water run-off. The SPD has an expectation that in most instances it should be possible for developments to ensure that there is no net increase in the speed or volume of surface water run-off. It also states that off-site works to reduce surface water run-off elsewhere may be sought where on-site surface water run-off is likely to increase.</p>
<p>In 2000 the North West was using 2,000 megalitres of water a day but this is projected to increase to 2,050 megalitres by 2023. This would mean that demand outstrips supply by approximately 50 megalitres a day.</p>	<p>The SPD recognises that due to climate change, summer rainfall is expected to decrease significantly and the frequency of exceptionally 'dry' summers is forecast to increase. It is also appreciated that demand for water is predicted to increase as a result of hotter summers, growth in the number of households and increased demand for consumer durables like dishwashers.</p>

	<p>Consequently, the SPD incorporates guidance to minimise water consumption in new development. It also includes an expectation that in most circumstances it should be practicable to include measures to achieve a minimum standard of internal potable water consumption of no more than 120 litres per day per person in all residential developments and 3m<sup>3</sup> per person/year in office developments.</p>
<p>It is crucial that water efficiency and water saving devices are designed in to new developments. Grey water recycling should be incorporated into all new development.</p>	<p>It is recognised that less predictable rainfall patterns, coupled with expected increases in demand for water, will augment the need water saving devices to be integrated into new developments. Consequently, the SPD encourages developers to incorporate measures to improve the efficiency with which water is used. Guidance is provided on a number of techniques. However, it is not considered appropriate to specify that a particular technique, such as grey water recycling systems, should be incorporated as the appropriateness of each technique will vary between developments.</p>
<p>Water meters should be installed on all new and existing homes</p>	<p>The SPD recognises the importance of minimising water consumption, especially because of the potential impacts of climate change. It is recognised that water meters can encourage a more efficient use of water. Consequently, the document encourages a range of measures to improve the efficiency with which water is used, including the use of water meters.</p>
<p>Collecting water to for reuse (greywater systems) is very commendable – but this too is questionable. It would require separate plumbing systems, it may need some cleaning before re-use e.g. disinfecting, it requires energy use to pump water out etc.</p>	<p>Due to climate change, summer rainfall is expected to decrease significantly and the frequency of exceptionally ‘dry’ summers is expected to increase. However, demand for water is predicted to increase as a result of hotter summers, growth in the number of households and increased demand for consumer durables like dishwashers. Consequently, minimising water consumption is considered to be essential. The SPD provides guidance on a range of measures, including greywater systems, which can be incorporated into new developments in order to reduce water consumption. However, the SPD does not prescribe particular measures that should be incorporated into new development.</p>
<p>It is much more difficult to introduce grey water recycling measures in new high rise developments because they have a smaller area to catch rainwater (relative to the number of residential units)</p>	<p>It is recognised that less predictable rainfall patterns, coupled with expected increases in demand for water, will augment the need water saving devices to be integrated into new developments. Consequently, the SPD incorporates an expectation that in most instances developments should incorporate measures to improve the efficiency with which water is used. However, it is recognised that the most appropriate</p>

	<p>measures to improve water efficiency will vary between developments. Accordingly, the document does not seek to stipulate particular techniques that must be integrated into new developments.</p>
<p>To achieve a zero carbon rating as set out in the <i>Code for Sustainable Homes</i> better technology needs to be used.</p>	<p>It is recognised that improvements in technology may be needed in order for new homes to achieve a zero carbon rating. However, the Government has already expressed the expectation that all new homes will be carbon neutral by 2016 by which time it is probable that new technologies will have been developed to improve the sustainability of new buildings.</p>
<p>Solar technology is still not efficient enough to provide for all the water heating needs in a house</p>	<p>Renewable energy is an integral part of the Government's longer-term aim of reducing greenhouse gas emissions. In addition, increasing the use of renewable sources of energy can reduce dependence on dwindling supplies of fossil fuels and bring greater diversity and security to Salford's energy supply. Consequently, the SPD introduces a requirement for all new major developments to incorporate renewable energy technologies to generate at least 10% of the predicted energy requirement. The SPD does not stipulate which particular technologies should be used.</p>
<p>New builds represent a small fraction of the total housing stock – the real problem is with existing houses, the majority of which have very poor energy efficiency.</p>	<p>Very significant levels of development are proposed in Salford over the next few decades. In order to minimise the potentially negative impacts of that new development on the local and global environments, and maximise the benefits for occupiers/users of buildings and spaces, it is vital that such development incorporates sustainable design and construction measures wherever possible. Although this document is concerned with improving the sustainability of future developments, it is recognised that existing buildings often have very poor levels of energy efficiency. Consequently, a section which encourages a range of measures to improve the sustainability of existing buildings has been incorporated into the SPD.</p> <p>Furthermore, the city council intends to develop a Climate Change Strategy which may address the energy efficiency of the existing housing stock.</p>
<p>s106 money should be used to improve the energy efficiency of existing housing.</p>	<p>The Council's approach to s106 agreements is set out in the adopted Planning Obligations SPD.</p>
<p>Technological advancements are reducing the cost of installing some renewable energy technologies. However, they are still not cheap enough to build in as standard and the technology is often not that simple to incorporate.</p>	<p>The recent supplement to PPS1 states that planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon,</p>

	energy supply. Consequently, it is considered reasonable for the SPD to incorporate an expectation that it should be practicable in the vast majority of cases for major new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply. However, the SPD states that full consideration should be given to how such measures can be incorporated within new developments, and that the proposals have been amended as far as practicable, taking into account all relevant material considerations including the overall viability of the development.
Ground source heat pumps can be integrated in the majority of low-rise housing developments.	Guidance has been incorporated into the SPD on the use of ground source heat pumps.
There is a need to provide a list of sustainable materials or an approved list of materials so that developers know up front what we would accept.	It is imperative that the SPD is not unduly restrictive as this could stifle innovative design. Consequently, it is not considered to be appropriate to specify particular materials that should be used in new developments. However, the SPD does incorporate guidance on maximising the use of responsibly sourced and/or recycled building materials.
The SPD shouldn't tie us down – technology moves on and the SPD should not be restrictive in terms of suitable materials because there is a risk that it will become out of date too quickly.	The SPD includes sections on energy efficiency, renewable energy technology and construction materials. However, it does not prescribe particular technologies/materials that must be integrated into new developments. Consequently, it is considered that the SPD is not unduly restrictive.
With regard to waste minimisation there is a need for stronger legislation to make people recycle more. This is especially the case in high-rise developments	Legislation to make people to recycle more would have to be set at a national level and is outside the remit of this SPD. However, the document does include guidance to encourage recycling by providing advice on the incorporation of recycling facilities in new development.
Community Charters should be set up to get people to pledge that they will recycle as much as they can.	The SPD includes guidance to ensure that developments incorporate facilities that make recycling easier for the occupants.
Recycling facilities should be provided with every development	Guidance on the incorporation of waste recycling facilities in new developments is provided in the SPD.
Apartments in Helsinki, Stockholm, and Copenhagen have high-rise blocks have one chute for all rubbish and waste gets separated afterwards.	It is recognised that there is a need for high rise developments to incorporate facilities to make recycling easier for the occupiers of new developments. As a result, the SPD provides guidance on measures that could be incorporated into new developments, including the use of chutes.
Bottle and can banks should be provided in all new developments but a change of culture is required to persuade everyone to use them properly. Bottles should be re-used by suppliers not recycled – bring back deposits	The SPD recognises that by providing sufficient, accessible space and facilities for the storage of waste for recycling the option of recycling can be made easier for the occupiers of new developments and the

on bottles and more people would return them.	municipal collection of materials will be assisted.
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### **Questionnaires**

To build upon this initial input, a short document and accompanying briefing note were sent to representatives of Salford's eight Community Committees. Copies of the document and questionnaire were also distributed to the people who had registered an interest in the document and green/environmental groups that have an interest in sustainable design and construction. An invitation to the workshop held on the 27<sup>th</sup> of March was also included with all of the questionnaires

The document informed people that a sustainable design and construction SPD is being produced; stated what the document's objectives are likely to be; highlighted that the document had to be consistent with the UDP (setting out what Policies ST16 and EN22 say) and identified some of the most salient issues when considering the sustainability of buildings.

The accompanying questionnaire endeavoured to ascertain information on a number of issues, including what measures should be encouraged in the SPD to reduce future contributions to climate change; what measures should be promoted to ensure developments adapt to future climate change that is regarded as inevitable; and how the SPD can encourage more sustainable patterns of waste management. A summary of the responses is provided below:

<b>Comments Received</b>	<b>Council's Response</b>
Grey water harvesting and green roofs should be encouraged to reduce the risk of flash flooding	The SPD incorporates guidance on minimising the speed and volume of surface water run-off in new development in order to reduce the risk of flash flooding. Within this section there is encouragement for the use of green roofs and grey water harvesting.
Increased water efficiency is absolutely vital to sustainable design and construction	Guidance has been incorporated into the SPD on minimising water consumption.
These are not problems solely akin to Salford. The Government should make it statutory for all new development to incorporate measures to reduce the risk of flooding.	National guidance on reducing the risk of flooding is provided in PPS25. However, there is a need to provide detailed guidance to explain what measures should be considered by developers to ensure that development does not increase the risk of flooding.
Sustainable urban drainage systems should be 'required' by all local authorities by a certain date.	It is recognised that reducing the risk of flooding is an essential element of the SPD. The SPD incorporates guidance on minimising the speed and volume of surface water run-off in new development. Within this section there is encouragement for the use of SUDS techniques as an alternative to conventional approaches to drainage.
Other sustainable drainage techniques such as 'Green Roofs' and 'Permeable Pavements' should also be encouraged.	The SPD incorporates guidance on minimising the speed and volume of surface water run-off in new development. Within this section there is encouragement for the use of SUDS techniques including green roofs and pervious pavements.
Raising floor levels should not be compensatory for building in a flood plain, nor should it detrimentally affect the aesthetic qualities of new development.	It is recognised that measures to reduce the risk of flooding are often essential in areas deemed to be at risk. The council is currently preparing a Flood Risk Guidance note which offers advice on flood risk mitigation

	measures that new development should incorporate to manage flood risk to an acceptable level. Links to this Flood Risk Guidance have been incorporated into the SPD.
In reference to sustainable urban drainage systems, could there be some additional information within the SPD on green roofs?	The SPD incorporates guidance on minimising the speed and volume of surface water run-off in new development. Within this section there is encouragement for the use of SUDS techniques including green roofs.
A bit of well meaning 'guidance' is pointless. For any scheme/development to be effective a BIG publication programme will be necessary. Everyone will have to be brought 'on board' for their own long term benefit.	As an SPD, the document may contain policies which expand on or supplement the policies in the development plan. However, policies which should be included in a development plan document and subject to proper independent scrutiny in accordance with the statutory procedures should not be set out in SPDs. This acts as a significant constraint on the type and extent of the policies that can be included in the SPD. The UDP certainly provides a basis for further policies, but care must be taken not to exceed the provisions of the UDP.  However, the production of the city council's Core Strategy has commenced and there is also an intention to develop a Climate Change Strategy. These documents may require developments to integrate these features into buildings.
Guidance on flood risk should not be too prescriptive as it is an evolving field	It is recognised that flood risk, like many of the other issues covered in this document, is an evolving field. The SPD incorporates linkages to the Council's Flood Risk Planning Guidance, which provides detailed advice to ensure that new development built in areas at risk of flooding in Salford is adequately protected from flooding and that the risk of flooding elsewhere is not increased as a result of new development. It also provides guidance on a range of SUDS techniques that can be integrated into new developments in order to reduce the speed and volume of surface water runoff. However, the SPD does not prescribe particular techniques that should be adopted.
The Council should give out rainwater butts.	The SPD recognises the importance of minimising water consumption, especially because of the potential impacts of climate change. The document encourages a range of measures to improve the efficiency with which water is used, including the use of water butts.
There is insufficient hard evidence of a need for new developments to integrate measures to reduce flood risk.	Approximately 12,250 properties across Salford are deemed to be at a risk of flooding. Furthermore, the risk of flooding is expected to increase as predicted climate change results in more extreme weather events, such as high intensity, short duration rainfall events. Consequently, it is considered

	that there is a need for new developments to integrate measures to reduce flood risk.
The Environment Agency must constantly renew flood plain designation and construct adequate relief measures.	It is acknowledged that predicted climate change might result in changes to the areas that are susceptible to flooding. Accordingly, the SPD incorporates an expectation that in most instances it should be practicable for developments to incorporate measures to reduce the impact of flood events. Linkages to the council's Flood Risk Guidance have been incorporated into this document.
Guidance on improving the water efficiency of new developments should be included providing that there is no overlap with the code for sustainable homes/BREEAM/NW sustainability check list	Guidance has been incorporated into the SPD on maximising the water efficiency of new developments.
The Environment Agency website has a detailed section on water resources as well as a published strategy 'Water Resources for the Future'. This is a framework for the management of water, protecting the long-term future of the water environment while encouraging sustainable development. The SPD should have regard to this strategy.	The Environment Agency strategy recognises that in much of England and Wales, water can be a scarce resource and water efficiency measures should be promoted actively. The strategy also acknowledges that climate change is of great significance to water resources and could affect the how much water is available. The SPD recognises the need for developments to incorporate water efficiency measures. Accordingly, the document incorporates guidance on these issues.
With regards to FSC timber, it is a good idea but locally produced materials of non-FSC accreditation should be considered first	The SPD incorporates guidance to encourage the maximum use of responsibly sourced and/or recycled building materials. It does provide encouragement for the use of locally sourced materials and acknowledges that the greater use of these can deliver both environmental and economic benefits. However, it is also considered to be appropriate to encourage the use of FSC timber.
The sustainability of building materials is a crucial element of sustainable design and construction	Guidance has been incorporated into the SPD on maximising the use of responsibly sourced and/or recycled building materials.
Large conglomerates will have to be brought on board - eg Peel Holdings used brown glass from Italy for its Quays HQ rather than glass from Pilkingtons at St Helens.	The SPD recognises that the potential for incorporating sustainable design and construction measures will be greatest in larger developments, and therefore, in accordance with national guidance and development plan policies, the policy focuses primarily on major developments.
Use local procured materials to reduce emissions from transport.	The SPD provides encouragement for the use of locally procured materials.
With regards to the use of high thermal mass materials to reduce energy loss from buildings - developments should consider using materials that exceed Building Regulation standards.	The SPD incorporates an expectation that in most instances it should be practicable for developments to achieve an energy efficiency standard that exceeds Building Regulations. It incorporates guidance on a range of measures that can help developments to achieve this.
Council tips should offer recycled materials back to householders	It is acknowledged that developments need to incorporate facilities to make recycling a

	convenient and practical option for the occupants. However, initiatives to offer recycled materials back to householders are outside of the remit of this SPD.
The problem with local and UK materials is that they are too expensive.	The SPD recognises that the use of locally sourced materials can deliver a number of environmental and economic benefits. While the SPD attempts to encourage the use of responsibly sourced materials it does not prescribe that locally sourced materials must be used.
Modern materials must be used sympathetically to blend with the built environment. Close liaison needed with architects to marry the two well.	The SPD recognises that measures to improve the sustainability of buildings cannot be considered in isolation from all other design considerations.
Encouraging the use of locally produced materials can have economic benefits as well as environmental.	It is recognised that using locally procured materials reduces the distance of transportation and associated energy costs; can help to maintain local identity and distinctiveness; and may contribute to maintaining jobs in the local, sub-regional and regional markets.
The SPDs objectives for waste fit particularly well with those for the Greater Manchester Municipal Waste Management Strategy and overall complement this Authority's intentions to make a positive impact for climate change in the sub region.	Noted
Recycling facilities should be provided for workers/construction materials during construction the construction process – bottles, plastics, packing materials etc	The SPD incorporates a requirement for developers to prepare a site waste management plan which must provide details of measures to ensure the recycling of waste generated during the construction process.
Recycling should be rewarded	It is acknowledged that developments need to incorporate facilities to make recycling a convenient and practical option for the occupants. However, initiatives to reward recycling are outside of the remit of this SPD.
Storage for wheelie bins is fast becoming a major issue in existing housing locations, Better provision must be made to make it easy to recycle.	Guidance on the incorporation of waste recycling facilities in new developments is provided in the SPD.
Measures to encourage recycling are essential if we are to reach the EU target of 68% non-landfill recycling/management	Guidance on the incorporation of waste recycling facilities in new developments is provided in the SPD.
The adaptive re-use of buildings would minimise construction waste, some demolition materials may also be capable of re-use.	The SPD incorporates guidance to encourage the maximum use of responsibly sourced and/or recycled building materials.
Bolton's SPD recommends 20% on site renewables but choice should be left to developer.	The recent supplement to PPS1 states that planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply. Within the document 10% of energy supply is suggested as an appropriate target. Consequently, it is considered reasonable for the SPD to incorporate an expectation that it should be practicable in

	the vast majority of cases for major new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply.
Whilst it is considered appropriate to provide guidance on the different types of renewable energy technology, it should be left to the developer to determine the most appropriate form of technology, both in terms of economics and efficiency. They should be required to demonstrate how the chosen technology will meet the required percentage.	The SPD incorporates a requirement that it should be practicable in the vast majority of cases for new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply. The SPD provides guidance on different technologies that could be incorporated. However, it is left to the developer to determine the most appropriate form of technology.
Reducing the energy use of new development has to be primary objective of the SPD	Guidance on minimising energy consumption in new developments is incorporated into the SPD.
Any outlay costs on improving energy efficiency will surely be offset in the future by lower energy bills.	The SPD recognises that securing well-designed buildings that minimise the need to consume energy can deliver cost savings to businesses and reduce heating bills for residential properties.
The Energy Saving Trust would recommend stipulating that developers exceed Building Regulation standards, by using our best or advanced practice standards. In addition, in domestic housing, increases in the standards of energy efficiency could reduce the chances of residents living in fuel poverty.	The SPD incorporates a chapter on minimising energy consumption. This states that, in accordance with Energy Saving Trust Best Practice, it is considered that it should be practicable in the vast majority of cases for new development to achieve energy efficiency standards at least 25% more efficient than the Target Emission Rate as defined by the 2006 Building Regulation Standard.
Salford needs an alternative energy centre	The city council intends to devise a Climate Change Strategy, which may consider the possibility of establishing an alternative energy centre.
Renewable energy is not the realm of planning – more to do with Building Regulations. We need less guidance and more certainty. The Local Authority should not interfere with ‘national’ issues and should itself set a good example.	National planning guidance in PPS22 encourages Local Planning Authorities to consider the opportunity for incorporating renewable energy projects in <i>all</i> new developments. Furthermore, a recent ministerial statement from Yvette Cooper expressed an expectation that all planning authorities devise policies that require a percentage of the energy in new developments to come from on-site renewables. Accordingly, it is considered that renewable energy is within the realm of planning.
Solar panels should be a requisite for all new developments	The SPD states that it should be practicable for new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply. It is not considered to be appropriate to specify what technologies should be utilised to achieve this standard as

	the appropriateness of each technology will vary between developments.
Sustainability standards are being set by Building Regulations and the Code for Sustainable Homes – the Council's planning policies should not seek to replicate or replace these.	The council recognises the potential improvements being suggested by the government in The Code for Sustainable Homes. At the moment The Code for Sustainable Homes is a voluntary agreement introduced to drive a step change in sustainable home building practice, but the government has signalled its intention to meet the improvements set out in The Code through amendments to Building Regulations. The SPD does not seek to replicate the Code for Sustainable Homes.
More attention needs to be paid to the real culprit, namely the existing housing stock, rather than constantly opting for the easy option of further restrictions on new buildings.	<p>Very significant levels of development are proposed in Salford over the next few decades. In order to minimise the potentially negative impacts of that new development on the local and global environments, and maximise the benefits for occupiers/users of buildings and spaces, it is vital that such development incorporates sustainable design and construction measures wherever possible. The document is primarily concerned with improving the sustainability of future developments. Nevertheless, it is recognised that the environmental performance of the existing housing stock is often very poor. Consequently, a section which encourages a range of measures to improve the sustainability of existing housing has been incorporated into the SPD.</p> <p>Furthermore, the city council intends to develop a Climate Change Strategy which may address the energy efficiency of the existing housing stock.</p>
These new requirements are making new homes ever more expensive at a time when affordability is a very serious concern and also at a time when these features are not wanted by consumers. Efforts should be made at changing public perception of the issue if this is not to be a very costly mistake. The SPD should be worded flexibly in recognition of these concerns.	<p>The levels of development proposed in Salford over the next few decades make it essential that such development incorporates sustainable design and construction measures wherever possible in order to minimise the potentially negative impacts of that new development on the local and global environments.</p> <p>Raising public awareness about the importance of improving the sustainability of new development is an important aspect of the SPD.</p>
Requiring on-site renewable energy generation is very forward thinking and is encouraging to see	Renewable energy is an integral part of the Government's longer-term aim of reducing greenhouse gas emissions. In addition, increasing the use of renewable sources of energy can reduce dependence on dwindling supplies of fossil fuels and bring greater diversity and security to Salford's energy supply. Consequently, the SPD introduces a requirement for all new major developments to incorporate renewable energy

	technologies to generate at least 10% of the predicted energy requirement. The SPD does not stipulate which particular technologies should be used.
BREEAM/Ecohomes standards are being used by EP and Housing Corporation as standard, as well as Manchester City Council	It is recognised that Ecohome standards provide a well known approach to measuring the sustainability of new development. However, these standards are likely to be replaced by the Code for Sustainable Homes, which introduces minimum standards for water and energy efficiency, uses a simpler system for awarding points and includes new areas of sustainable design.
A BREEAM assessment should be required for all office, retail, industrial, school buildings etc but as eco-homes will be phased out within a couple of years the code for sustainable home assessment should be required with a minimum of 4 or 5 stars being required	It is recognised that Ecohome standards will be replaced by the Code for Sustainable Homes, which introduces minimum standards for water and energy efficiency, uses a simpler system for awarding points and includes new areas of sustainable design. The council welcomes this approach and the policies of the SPD do not seek to replicate the Code.
Recent housing has not been built to acceptable standards as recognised by Government. 'Carrots' are essential but so are penalties if standards are not met – 'make it hurt!!'	It is recognised that there is a need to improve the environmental performance of new housing development. The SPD seeks to address this by introducing the expectation that it should be practicable for developments to achieve higher standards of sustainable design.
With Climate Change, hotter summers will mean 'cooling' or 'air-con' is needed. How is this increase in energy demand taken into account in SPD?	The SPD recognises that climate change is likely to result in more extreme weather, including hotter summers. It encourages a range of techniques, such as the use of green roofs and natural ventilation systems, which can ensure that the occupants of new buildings enjoy a pleasant living and working environment in hotter temperatures. In addition, the document encourages new developments to provide easy access to both public and private open space that provides shade and shelter from the more extreme weather expected as a result of climate change, particularly higher summer temperatures. Furthermore, the SPD states that if the absence of such spaces may result in a greater need for air conditioning, then this should be offset by a proportionate increase in energy efficiency and/or use of renewable energy supplies, or by evidence that the building has been designed to maximise cooling and minimise solar gain in the summer.
There is a need to provide adequate shading, parks and 'green' infrastructure for human comfort in hot summers	The SPD recognises that an adapted and sustainable urban environment makes use of well-designed public and private open space that offers an accessible choice of shade and shelter from higher summer temperatures expected as a consequence of climate change. Guidance is contained within the SPD on incorporating these open spaces

	within new developments.
Biodiversity – protection and enhancement of natural environment – should be dealt with by the SPD.	The SPD incorporates a section on maximising the provision of wildlife habitats in new developments. In addition, the document includes references to the council's Nature Conservation and Biodiversity SPD.
Developers will use the threat of increased costs to try to escape these new requirements	Many of the measures advocated in the SPD could reduce costs for developers. For example, by providing a system to manage material supply and waste, a SWMP can significantly diminish development costs to by reducing the likelihood that materials will be over-ordered and decreasing the volume of waste that needs to be disposed. It is also important to recognise that well-designed developments which offer the occupants a comfortable living environment and protection from the risk of flooding are likely to be increasingly desirable as climate change progresses.
What will be done about the current energy inefficient buildings – insulation, replacement of old boilers etc?	Although this document is primarily concerned with improving the sustainability of future developments, it is recognised that the environmental performance of existing buildings is often very poor. Consequently, a section which encourages a range of measures to improve the sustainability of existing buildings has been incorporated into the SPD.  Furthermore, the city council intends to develop a Climate Change Strategy which may address the energy efficiency of the existing housing stock.
The HQ of United Co-op in Rochdale provides a good example of sustainable buildings – no light switches, renewable energy, solar panels etc.	Noted
Too much prescription can stifle innovation. Deal with projects/sites on their merit	The SPD promotes buildings that are designed and constructed to minimise their environmental footprint, are economic to run over its whole life cycle, and fit well with the needs of the local community. The document does not prescribe particular technologies that must be incorporated and recognises that different approaches to improving the sustainability of buildings will vary from project to project.
Hard surfacing of car park areas should not be acceptable - permeable materials should be a requirement	The SPD includes an expectation that in most instances it should be possible for developments to ensure that there is no net increase in the speed or volume of surface water run-off. A range of measures is encouraged in order to meet this expectation, including the use of permeable surfaces.
The proposed content of the SPD is bureaucratic and would add to the burden of designers.	The SPD promotes buildings that are designed and constructed to minimise their environmental footprint, are economic to run over its whole life cycle, and fit well with the needs of the local community. The predicted

	<p>impacts of climate change and the need to tackle other pressing issues, such as waste generation, mean that it is essential that the sustainability of new development is improved. The document does not prescribe particular technologies that must be incorporated into new developments and recognises that the approach to improving the sustainability of buildings will vary from project to project. The SPD does incorporate standards that it should normally be practicable for developments to achieve. However, it remains flexible in how these standards are met.</p>
<p>Renewable energies are essential but solutions must be appropriate. Conurbations like Salford need big solutions – CHP, solar panels, etc. Wind turbines are not appropriate in an urban environment</p>	<p>The SPD states that it should be practicable for new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply. It is not considered to be appropriate to specify what technologies should be utilised to achieve this standard, as the appropriateness of each technology will vary between developments. Consequently, guidance is provided on a number of technologies but the document does not prescribe which ones should be utilised.</p>
<p>Plenty of emphasis on new development but what about the mass of existing buildings. Salford has many office blocks, and many fine old buildings – are these to be addressed?</p>	<p>Although this document is primarily concerned with improving the sustainability of future developments, it is recognised that the environmental performance of existing buildings is often very poor. Consequently, a section that encourages a range of measures to improve the sustainability of existing buildings has been incorporated into the SPD.</p> <p>Furthermore, the city council intends to develop a Climate Change Strategy that may address some of these issues.</p>
<p>A Biodiversity/ecology section should be included.</p>	<p>The SPD incorporates a section on maximising the provision of wildlife habitats in new developments. In addition, the document includes references to the council's Nature Conservation and Biodiversity SPD.</p>
<p>Provision of measures to enhance Biodiversity associated with the built environment, e.g. bird and bat boxes, should be encouraged in your SPD.</p>	<p>As above</p>
<p>Design techniques should encourage and enhance biodiversity by promoting 'green spaces and networks' in new developments. This can contribute to higher quality environments for people and habitats for wildlife.</p>	<p>As above</p>
<p>Please include references to your Greenspace SPD and setting of new development within green infrastructure.</p>	<p>References to the council's Greenspace SPD have been incorporated at appropriate sections of the document.</p>
<p>Sustainable design and construction methods</p>	<p>The SPD recognises that sustainability</p>

and techniques will in some circumstances have an impact upon the historic environment whether upon individual listed or locally important buildings or upon historic areas through for example the orientation of buildings or renewable energy measures. I suggest that the SPD includes a short section on this.	measures cannot be considered in isolation from all other design considerations and that there is a need to balance these measures with the need to protect the existing character of the area and local amenity.
An objective should be added the need to preserve and enhance the historic environment, its buildings, areas, and archaeology.	The SPD is principally concerned with promoting buildings that are designed and constructed to minimise their environmental footprint, are economic to run over its whole life cycle, and fit well with the needs of the local community. However, it does recognise that measures to improve the sustainability of buildings cannot be considered in isolation from all other design considerations, which includes the need to preserve and enhance the historic environment, its buildings, areas, and archaeology. Furthermore, the council is currently preparing a Design SPD which will encourage developments to respect their context.
The SPD should explain where developers, building professionals, individuals and local authority officers can go for further information on sustainable design and construction.	A number of weblinks have been incorporated into the SPD

### **Presentation to Planning Scrutiny Committee**

A presentation to Members on the Planning Scrutiny Committee took place on 20<sup>th</sup> March. The presentation provided an introduction to Salford City Council's UDP Policies on Sustainable Waste Management and Resource Conservation, before setting out the suggested scope and probable objectives of the Supplementary Planning Document. A period of open discussion followed, in which the main comments raised were:

<b>Comments Received</b>	<b>Council's Response</b>
The document should not just encourage developers to integrate these features into buildings – it should be a requirement	As an SPD, the document may contain policies which expand on or supplement the policies in the development plan. However, policies which should be included in a development plan document and subject to proper independent scrutiny in accordance with the statutory procedures should not be set out in SPDs. This acts as a significant constraint on the type and extent of the policies that can be included in the SPD. The UDP certainly provides a basis for further policies, but care must be taken not to exceed the provisions of the UDP.  However, the production of the city council's Core Strategy has commenced and there is also an intention to develop a Climate Change Strategy. These documents may require developments to integrate these features into buildings.
There is a definite need for guidance to ensure that cycle facilities are fit for purpose.	It is recognised that the SPD should encourage more sustainable forms of travel.

	The SPD incorporates a section on cycling facilities in new developments and provides detailed advice on cycle storage, and information on the provision of facilities for cyclists and cycle lanes.
There is a need to encourage people to make their homes more efficient i.e. through the use of low-energy bulbs, insulation. Information for improving the sustainability of existing houses should be considered in the SPD.	Although this document is primarily concerned with improving the sustainability of future developments, it is recognised that the environmental performance of existing housing is often very poor. Consequently, a section that encourages a range of measures to improve the sustainability of existing housing has been incorporated into the SPD.  Furthermore, the city council will be developing a Climate Change Strategy that may address some of these issues.
Water meters and facilities for the re-use of rainwater should be included in all new builds	The SPD recognises the importance of minimising water consumption, especially because of the potential impacts of climate change. It is recognised that water meters can encourage a more efficient use of water. Consequently, the document encourages a range of measures to improve the efficiency with which water is used, including the use of water meters.
It is important that recycling facilities for residential properties are taken into account when considering impact on the street scene	Guidance on the incorporation of waste recycling facilities in new developments is provided within the SPD.

## 5. Formal Public Consultation

The SPD documents were subject to a 6 week period of formal public consultation from 14<sup>th</sup> September to 25<sup>th</sup> October 2007. These documents were available for inspection at the following locations:

- On the council's website: <http://www.salford.gov.uk/sustainable-design>
- Civic Centre, Salford City Council, Chorley Road, Swinton, Salford, M27 5BW.  
Opening times: Monday to Friday, 8.30am to 4.30pm.
- At all Salford Libraries during normal opening hours

In addition, during the formal public consultation period a number of informal meetings were held with developers to discuss the content of the document. Following the meetings, a number of written comments were received; these have been considered as part of the formal consultation process and are included in Appendix C.

The statutory consultees that were formally invited to comment by letter on the draft SPD are listed at Appendix B.

## 6 Representations Received

The following organisations/persons submitted representations within the formal public consultation period:

- Campaign to Protect Rural England (CPRE)
- Countryside Properties
- Salford City Council - Darren Findley

- Salford City Council – Bev Lydiate
- Ellesmere Park Residents Association
- Emerson Group
- Environment Agency
- Government Office for the North West
- Highways Agency
- Home Builders Federation (HBF)
- Natural England
- Network Rail
- Nigel Openshaw – Group Engineer, Urban Vision
- North West Regional Development Agency (NWDA)
- Roger Burton (JMC Architects)
- Theatres Trust
- United Utilities
- WM Morrisons Supermarkets Plc

Appendix C sets out a detailed schedule of all representations, the council's response, and proposed changes to the SPD.

## **7 Main Issues Raised**

The main issues raised during formal consultation, prompting revision to the draft SPD were:

### **Minimising Energy Consumption/Renewable Energy**

- Care required in the residential design process to ensure that building performance is optimised without over-heating;
- Consideration needed on how to control heat gain in non-domestic buildings, for example, by orientating buildings in such a way as to maximise daylight without solar gain;
- The suggested provision of 10% of energy from renewable sources on site should be removed and the SPD amended to encourage use of the most efficient renewable energy resources that could be on-site, local or decentralised;
- Undue prescription is implied in listing 'requirements', especially where, for example, the Code for Sustainable Homes is voluntary at present;
- The SPD should fall in line with Part L of the Building Regulations;
- Sections 6 and 7 should be merged as both energy conservation measures and low/zero carbon emissions technology are inter-related and will contribute to reducing demand for energy;
- Qualification of statements on and usage of Solar Panels, Ground Source Heat Pumps and Wind Turbines;
- Green travel plans should encourage use of alternative, lower carbon transport;

### **Surface run-off Considerations**

- Need to minimise surface water run off in relation to all development; on brownfield sites this should be less than the original discharge;
- Drainage proposals for adopted roads to be agreed in advance with EA;
- Swales and basins will not be adopted by either the City Council or United Utilities;
- SUDS should be encouraged or sought where appropriate rather than required as a matter of course;
- Observations about increased areas of hard standing and paving over garden areas; need to consider more sustainable alternatives;

- Links should be made to the Environment Agency web –site and Living Roofs web - site.

#### **Minimising Pollution**

- Noise mitigation needs to be carefully designed into new development;
- Reference needed to the Considerate Constructors Scheme;

#### **Minimising water consumption**

- Water conservation measures aimed at reducing consumption cannot realistically achieve a minimum standard of 105 litres per day per person; the standard should be revised to 120 litres;
- The sustainability of processes associated with using reclaimed water remain questionable and cannot be endorsed by United Utilities;
- Selection of landscape species should consider minimising the need for watering.

#### **Waste Management and Re-cycling Issues**

- A requirement for a Site Waste Management Plan should be obviated where other submitted documents or existing procedures seek to achieve a similar outcome;
- Cross reference should be made to Liveability section of Environment Directorate for advice on waste recycling and collection facilities and acknowledgement that this can be subject to change;
- Responsibility for bin maintenance to be clarified;
- General observations on waste recycling in new development;
- Linkages should be made with the Design SPD in relation to measures for the conservation and enhancement of local distinctiveness;
- Further advice needed on sustainable construction materials;

#### **Maximising provision of wildlife habitats and bio-diversity considerations**

- Ecology is important in assessing the sustainability of homes;
- Observations on siting of nest boxes for birds and bats;
- Planting should not impinge on neighbouring development;
- The benefits of peat bogs as carbon dioxide sinks, as well as primary nature conservation habitats, should be acknowledged;
- Benefits of sustainable design and construction techniques in terms of biodiversity and habitat creation/ enhancement should be emphasised;

#### **Policy Context Issues**

- Cross reference should be made to the saved UDP policies that the SPD is supplementing;
- More substantial reference needed to the new PPS1 – Planning and Climate Change and how it has influenced the policy context for the SPD;
- Relevant policies in draft RSS to be taken into consideration;

## **8 Sustainability Appraisal**

In adopting the final draft, the council must consider how sustainability issues have been integrated into the document and how the Sustainability Appraisal (SA) has been taken into account.

Recommendations for changes to the consultation draft are included in the SA report that accompanies the SPD. None of the representations received questioned the content of the SA.

The appraisal has been amended to reflect the changes to the SPD made in response to other representations. It is considered that sustainability issues have been adequately addressed. The SA also includes details of ways in which the effectiveness of the SPD will be monitored and suggests a number of potential indicators to be used as part of the SA framework. The revised SA is published on the council's website ([www.salford.gov.uk/sustainable-design](http://www.salford.gov.uk/sustainable-design)).

## **9 Equality Impact Assessment**

In accordance with the Race Relations (Amendment) Act 2000, a first stage Equality Impact Assessment has been carried out on the draft SPD. This concluded that a more detailed appraisal was not required, as the SPD has no significant differential impact on any group.

The assessment is available on the council's website ([www.salford.gov.uk/sustainable-design](http://www.salford.gov.uk/sustainable-design)).

## **Appendix A**

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION PRIOR TO THE  
PREPARATION OF THE CONSULTATION DRAFT

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION TO DATE	METHOD OF CONSULTATION		
	Consultees	Primary User Event	Workshop
Bob Collier (Acremoss Designs Ltd)	X		
Michael Cambden (Arca Architects)	X		
John Lee (Arca Architects)	X		
Mike Hodge (Architectural Liason Unit GMP)	X		
Ruth Jackson (ARUP)	X		
Russell Worthington (Ask Property Development Ltd)	X		
Stephen Warburton (Bovis Lend Lease)	X		
Philip Allsop (Britch & Associates)	X		
Patrick Berry (Broadway Malyan)	X		
Rod Marsh (Broadway Malyan)	X		
Bashar Issa (BSC Group)	X		
Alistair Weir (Buttress Fuller Alsop Williams)	X		
Jim Wensley (Central Salford Urban Regeneration Company)	X		
Felicity Goodey (Central Salford Urban Regeneration Company)	X		
Peter Haymes (Charlestown & Lower Kersal NDC)	X		
Julie Wickington (Charlestown & Lower Kersal NDC)	X		
Les Brown (Countryside Properties)	X		
Jane Aspinall (Countryside Properties)	X		
Mike Hitchmough (Dandara Limited)	X		
David Young (David Young architects)	X		
Richard Maung (Drivers Jonas)	X		
Justin Cove (DTZ)	X		
Anton Shultz (East Salford)	X		
Mike Thorpe (East Salford Community Committee)	X		
Jim Wheelton (Eccles Community Committee)	X		
Richard Frankland (FKDA Architects/Designers)	X		
Julian Holder (English Heritage)	X		
Sylvia Heron (Environment Agency)	X		
Denver Humphrey (Fairhursts Design Group)	X		
Rosie Ollé (GMPTE)	X		
Peter Bojar (Great Places Housing Group)	X		
Neel Shah (Guest of FKDA)	X		
Angela Mealing (Higham & Company)	X		
Terry McBride (HMR West Team)	X		
Bill Jennings (JDA Architects)	X		
Caterine Larmouth (Knight Frank LLP)	X		
Oliver Bird (Manchester & Salford - HMR Pathfinder)	X		

Martin Percox	X		X
Chris Weetman (MPSL Design)	X		
David McCall (OMI Architects)	X		
Mark Royle (Orbit Developments)	X		
Paul Butler (Paul Butler Associates)	X		
Peter Nears (Peel Holdings)	X		
Tracy Morrison (Planning Aid)	X		
Joe Martin (Salford City Council)	X		
Marion Raines (Salford City Council)	X		
Maura Carey (Salford City Council)	X		
Liz Dixon (Salford City Council)	X		
Iain Smith (Savills Commercial Limited)	X		
Martin Ellerby (Sheppard Robson)	X		
John Clarke (SMC DTR:UK)	X		
Christie McDonald (Steven Abbott Associates)	X		
Gill Robinson (Stride Treglown Chapman Robinson)	X		
Roger Lomas (Taylor Young)	X		
Tim Wallbank (Triangle Architects)	X		
Norman Gilkinson (University of Salford)	X		
Patrick Sheridan (Urban Splash)	X		
Sylvia Bland (Urban Vision)	X		
Emma Singleton (Urban Vision)	X		
Trupti Patel (Urban Vision)	X		
Paul Shuker (White Young Green Planning)	X		
David Hardman (United Utilities)		X	
David Short (Emerson Group)	X	X	
Rachel Hamilton (Salford URC)		X	
Simon Glynn (Design Team)		X	
Alex McDyre (Environment and Projects Team)		X	
Matthew Gaskell (Space Developments)		X	
Peter Ball		X	
Valerie Ivison (Weaste Community Committee)		X	
Darren Lovegrove (Bellway)		X	
Keith Ivison (Weaste Community Committee)		X	
Terry Mumford (New Prospect Housing Ltd Steering Group)		X	
Julian Carter (Renewables Northwest)			X
Andrew Thomas (Centre for Construction Innovation)			X
Matthew Wilkinson (NWRA)			X
George Wimpey Manchester Ltd			X
Jane Dickman (Persimmon Homes)			X
Ian Stewart			X
Andrew Thomson/Adele Snol (Broadway Malyan)			X
Planning Policy Sections (Bury MBC, Bolton MBC, Manchester City Council, Rochdale			X

MBC, Stockport MBC, Tameside MBC, Trafford MBC, Warrington Borough Council, Wigan MBC)			
Richard Lomas (CB Richard Ellis Ltd)			X
H Lancaster/D Chambers (CLA North)			X
Mr J Wilcock (Cliff Walshingham)			X
R Jackson (Cooperative Group Property Division)			X
Tony Hill (Cophthorne Hotel)			X
Janet Matthewmann (Dept. of Culture Media and Sport)			X
Justin Cove (DTZ PIEDA Consulting)			X
Judith Nelson (English Heritage)			X
Louisa Cusdin (Framptons)			X
Phil Lally (GONW)			X
Anita Shaw (Greater Manchester Waste Disposal Authority)			X
Helen Barker / Anton Schultz (Groundwork Manchester, Salford and Trafford)			X
Angela Mealing (Higham and Co.)			X
Jane Aspinall (HOW Planning)			X
Emma Latimer (Knight Frank)			X
Linda Moore (Manchester & District Housing Association)			X
Nigel Spaggins (Manchester Diocesan Board of Finance)			X
Kathryn Brindley (MCP Planning)			X
Daniel Connolly (Morris Homes Ltd.)			X
Janet Belfield (Natural England)			X
Brian Enright (NDC)			X
Ian Wray (NWDA)			X
Andrew Bower (Npower Renewables)			X
Mr R J Newton (NWRA)			X
Mrs W Moore (Partington Town Council)			X
Sarah Smith (Paul Butler Associates)			X
Michael Nuttall (Peel Holdings)			X
Philip Rothwell (PRDS)			X
David Light (PZ Cussons)			X
A Bishop (RMS International)			X
Stuart Cooper (Roger Hannah and Co.)			X
Mary Ann Byrne (Salford Disability Forum)			X
Michael Jones (Royal Mail)			X
Trevor Adey (Savills)			X
Frazer Sandwith (Scott Wilson)			X
Michelle Grimshaw (Steven Abbott Associates)			X
Richard Fearnall (Strutt and Parker)			X
Kath Ludlam			X
Paul Lester (The Development Planning Partnership)			X
Helen Winkler (Tyler Parkes Partnership)			X
Lee Bullock/Annette Elliot (United Co-			X

operatives Ltd)			
Vicki Richardson (Walton and Co)			X
Paul Shuker (White Young Green Planning)			X
Council Members of the Planning Scrutiny Sub-Committee			
David Allen (Safety Systems UK)			X
Susan Gallacher (Health Improvement Team PCT)			X
Neil McInroy (Centre for Local Economic Strategies)			X
Hannah Kavanagh			X
Abigail Dodds (British Wind Energy Association)			X
Brock Carmichael Associates			X
Graham Murray (Cheshire County Council)			X
Liz Brown (CABE)			X
Greater Manchester Ecology Unit			X
Linda Wright (Home Builders Federation)			X
Sheila Murtagh (Partners in Salford)			X
Jonathon Best (Rapleys)			X
Pauline Randall (Randall Thorp)			X
Malcolm Walker (Peacock & Smith)			X
Peter Crompton (Pendleton College)			X
Chris Thomas (Chris Thomas Ltd)			X
Revd Mark Howarth (Church of England)			X
Mr Nazar			X
Chesters Coaches			X
Derek Butterworth			X
David McCabe (Aggregate Industries)			X
A F McNulty (Armitage Residents Association)			X
Bangladesh Association			X
Paul Stewart (Barratt Ltd)			X
Alison Truman (British Waterways)			X
Adam Lockett (Drivers Jonas)			X
B Thompson (Ellesmere Park Residents Association)			X
Rose Freeman (Theatres Trust)			X
Mark Cooper (Wainhomes Ltd)			X
Tara Valley			X
C Morris (Westhoughton Town Council)			X
Hannah Phillip (Vincent and Gorbing)			X
Naomi Cross (The Spab)			X
Sophie Murray (Seedley and Langworthy Trust)			X
Matthew Rushton (Sport England)			X
Trevor Burton (Shelter)			X
Laura Ross (Stewart Ross Associates)			X
Novotel Manchester West			X
Northbank Management Company			X
Julian Niman (Nimans Ltd)			X

Jill Stephenson (Network Rail)			<b>X</b>
Kristian Marsh (Highways Agency)			<b>X</b>
J Campbell (Hill Street Residents Association)			<b>X</b>
Veronica Fowler (Irlam Medical Centre)			<b>X</b>
Harry Pennington (J. Fletcher Ltd)			<b>X</b>
Nigel Blandfield (Red Rose Forest)			<b>X</b>
Timothy Jones (Roland Bardsley [Builders] Ltd)			<b>X</b>
Salford Disabled Motorists Association			<b>X</b>
M Scantlebury (Salford LIDS)			<b>X</b>
Mr J Rose (John Rose Associates)			<b>X</b>
D Page (King Sturge)			<b>X</b>
Stephen Connell (Lancashire Circuit of Jehovah's Witnesses)			<b>X</b>
Kevin Fowler (LVMH UK Ltd)			<b>X</b>
David Wilson (Makro)			<b>X</b>
Sylvia Heron (Environment Agency)			<b>X</b>
Martin Higgins (Greater Manchester Fire and Rescue)			<b>X</b>
John McGrath (Greater Manchester Police)			<b>X</b>
Mary Ferrer (Claremont Community Association)			<b>X</b>
Shahzad Tahir (Contour Homes)			<b>X</b>
John Langston (CPRE)			<b>X</b>
Peter Lloyd (David Mclean Ltd)			<b>X</b>
Frank Roesiger (Degnissa CC UK Ltd)			<b>X</b>
Hugh Wilson (Dorribo)			<b>X</b>
Norman Shacklady (Swinton Community Committee)			<b>X</b>
Chairs and Vice Chairs of Salford's Community Committees			<b>X</b>
Andrea Key (Taylor Young)			<b>X</b>
Katy Lightbody (Development Planning Partnership)			<b>X</b>
David Yates			<b>X</b>
Manchester is My Planet			<b>X</b>
Envirolink Northwest			<b>X</b>

## **Appendix B**

STATUTORY, GENERAL AND SPECIFIC CONSULTEES WHO WERE INVITED TO COMMENT ON THE DRAFT SPD (IN ADDITION THOSE LISTED IN APPENDIX A)

Bolton MBC  
Bury MBC  
CABE  
Central Salford Regeneration Company  
Charlestown and Lower Kersal New Deal for Communities Partnership Board  
Civic Trust (Northern Office)  
English Heritage  
English Nature  
GM Archaeological Unit  
Government Office North West  
Greater Manchester Ecology Unit  
Greater Manchester Geological Unit  
Manchester City Council

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Mobile Operators Association  
North West Development Agency  
North West Regional Assembly  
Salford CAB  
Salford Community Network  
Salford Disability Forum  
Sustainability North West  
The Countryside Agency  
The Environment Agency

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Stockport MBC

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Tameside MBC  
Trafford MBC

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United Utilities  
Warrington BC  
Wigan MBC

**Appendix C**

SCHEDULE OF RESPONSES TO CONSULTATION DRAFT AND THE COUNCIL'S  
RESPONSE

**SCHEDULE OF RESPONSES TO CONSULTATION DRAFT AND THE COUNCIL'S RESPONSE**

<b>Original Paragraph/Policy</b>	<b>Respondent</b>	<b>Nature of Response</b>	<b>Representation</b>	<b>Council's Response</b>
Chapter 6 Minimising Energy Consumption	Representor: 159 Mr Roger Burton (jmarshitects)	Support with conditions	<p>Overall this is an excellent document but there are some aspects on which I would like to respond. In section 6.8 you quite rightly refer to the need for the correct design and orientation of the building to take advantage of daylight and solar gain. In principle this is correct but the detail of this section is usually regarded as applicable to residential accommodation and the same may not apply to non- domestic buildings.</p> <p>In fact, the key to this is that the solar gain should be 'useful' in that it contributes to the energy requirements of the building without resulting in overheating. There are certainly cases now where well insulated and airtight homes - to comply with new Building regulations standards - with anything other than modest south facing glazing are overheating and even beginning to require comfort cooling and thus increasing overall energy consumption/CO2 output. Clearly, in a domestic situation this is to be avoided so great care needs to be taken in the design process, with thermal modelling where appropriate, to ensure that the building performance is optimised without overheating. This is also particularly important if we are to anticipate an increase in summertime temperatures.</p>	<p>It will be highlighted in the SPD that the need for the correct design and orientation of the building to take advantage of daylight and solar gain generally applies to residential accommodation rather than to non-domestic dwellings.</p> <p>The SPD will be expanded to highlight the need for care in the design process of a domestic situation. It will be expanded to suggest the use of techniques such as thermal modelling, where appropriate, to optimise building performance without overheating.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>In non-domestic buildings the design criteria are different. The higher occupancy levels, equipment and times of use, for instance, are likely to be different to domestic. Lighting levels in the workplace are likely to be higher than those in the home and the use of lighting itself contributes to the internal heat gains as well as consuming a significant proportion of the overall energy and therefore contributing to CO2 output. In fact, the problem with non-domestic buildings is more likely to be one of controlling these heat gains potentially requiring cooling for a large proportion of the year rather than heating. Achieving good levels of daylight and natural ventilation are still desirable goals - the daylighting can, when combined with lighting controls, reduce the energy consumption but on the other hand over-glazing can, if not correctly designed and given solar protection, lead to overheating. In this respect north orientations are very good for maximising daylight without solar gain, east can provide useful solar gains in the morning before the building risks overheating, south has less risk due to higher sun elevation and can be managed to exclude summer sun but admit when more useful in the heating season and the west elevation is the worst with low sun angles in the afternoon in the summertime when air temperatures are higher and the potential for cooling by natural ventilation is at its lowest. This might suggest, contrary to the guidance that the best option for such a building is that key spaces might equally be on a north facade.</p> <p>Thus the guidance for non-domestic buildings cannot be so simplified. Part L of the Building regulations</p>	<p>The SPD will be expanded to highlight the potential need to control heat gains for non-domestic buildings, for example, by orientating buildings in a northerly direction to maximise daylight without solar gain. It will also highlight the need for non-domestic buildings to be thermally modelled and to predict internal temperatures in the design stages.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			requires summertime temperatures to be limited to 28degC for all but a few occupied hours. Generally, non-domestic buildings will be thermally modelled and internal temperatures predicted in the design stages and this should be encouraged to ensure appropriate design responses to minimise CO2 output while maintaining satisfactory and healthy internal working conditions.	
6.12 Landscape	Representor: 159 Mr Roger Burton (jmarshitects)	Observations	When selecting plant species consideration should also be given to future climate change and the minimisation of the need for watering. Generally locally native species might be expected to survive in the prevailing weather and rainfall conditions but planting and preparation of the ground should take this into account. If changes in weather patterns and changes in temperature are anticipated perhaps non-local/native species may be regarded as more appropriate. An example of this is the recent adoption of a planting policy by Peckham (a high street location on a busy thoroughfare), which uses non-native/tropical species, which it is believed, will thrive without watering in an anticipated warmer climate.	The SPD will be expanded to highlight the need to consider future climate change and the minimisation of the need for watering. The emphasis will normally be placed on selecting local/native species however it is recognised that it may be possible to select non-native/tropical species to support a particular design scheme.
Paragraph 6.17 Building Regulations.	Representor: 159 Mr Roger Burton (jmarshitects)	Observations	Reference might usefully be made in this paragraph to paragraph 8.3 and the value of green roofs in reducing the 'heat island effect' (equally, paragraph 8.3 might have a reference to the use of green roofs)	The value of green roofs in reducing the 'heat island effect' will be included.

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			Reference could also be made in this paragraph to the 'maximising the provision of wildlife habitats' section, paragraph 16.5, which does cover green roofs.	A cross-reference will be included.
Paragraph 7.2 In accordance with the Government Consultation on the Climate Change Supplement to Planning Policy Statement 1, it is considered that it should be practicable in the vast majority of cases for new development to provide at least 10% of its energy supply	Representor: 159 Mr Roger Burton (jmarshitects)	Other	<p>Clarification is required on the intentions with respect to acceptable sources of renewable energy.</p> <p>Subsequent to the 'Merton Ruling' policies are being established by a number of Local Authorities, which require the provision of a percentage of energy from renewable sources on a project or development basis, usually 10% or in some cases 20%. The Government Consultation, which you quote, offers the alternative of 'connections to a renewable or low-carbon decentralised energy supply'. The document in turn then refers to 'existing decentralised energy supplies within the locality'. There is need for clarity on this issue. There is concern in the construction industry that the requirement for provision to be made on site is not necessarily the most appropriate way to deliver an</p>	<p>This SPD does not specify which sources of renewable energy are acceptable but provides guidance on some of the various options available. In line with the recently published Supplement to PPS1 this section of the SPD has been updated.</p> <p>The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1. The SPD will be amended to include reference to off-site renewable energy installations.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>increase in the utilisation of renewable energy and it is generally regarded as the least effective way given the scale of installation. In the instance of wind power, larger scale installations either off shore or over open ground are significantly more efficient and cost effective than small-scale urban installations.</p> <p>The inclusion of the term 'connections to a decentralised energy supply' could suggest the development and use of these far more efficient sources, and could be extended to include wind power, tidal power, estuary barrages, bio-mass generation etc. This could have considerable advantages in ensuring that clients and sponsors of construction gain the best possible returns on their investment in terms of reduced carbon output. Equally, they may be encouraged to exceed the 10 or 20% requirement if provision of 'green' energy becomes more widely available and is cost effective and competitive.</p> <p>However, the addition of the term 'decentralised within the locality' and particularly 'existing' suggests that the decentralisation potential is limited. Encouragement should be given to the use of the most efficient renewable energy sources - whether these are on site, local or decentralised - all options should be available and acceptable to satisfy this requirement. The potential for on site sources to deliver all but the minimum levels of renewable energy is limited. Development of local sources where they can be proven to be more cost effective should be encouraged and not limited to 'existing' sources.</p>	<p>Comments noted.</p> <p>Comments noted. The Council will welcome the most efficient and appropriate energy source where feasible and in line with the provisions of this SPD.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>Mechanisms need to be put in place to enable a financial commitment to an off-site renewable supply to substitute for on-site provision on a long-term basis and to satisfy the requirements of the planning policy. The availability of and connection to larger, decentralised installations also has significant advantages in terms of our ability to achieve targets for zero carbon homes in 2016. A significant proportion of household energy is required as high grade, i.e. electricity, for lighting and appliances, and there are physical limits to what can be generated on a site basis, which means it is unlikely that the total requirement can be fulfilled without the addition of off-site supplies. Thus, the acceptance of the use of off-site supply places Salford in a position to meet this challenging requirement before 2016. Equally, our considerable stock of existing homes and buildings can benefit from a well developed market for decentralised renewable energy generation potentially enabling all their energy demands - for appliances, space heating and hot water - to be provided carbon free. There is an opportunity here to ensure that developments have a choice in how the renewable energy is sourced which in turn can encourage market development to satisfy the requirement for an ever increasing proportion of our energy to be provided by low or zero carbon technologies. It will enable the current 10% requirement to be more readily and rapidly increased over time.</p>	
Paragraph 7.9 Solar Panels.	Representor: 159 Mr Roger Burton (jmarshitects)	Observations	Solar panels - Is the statement - 'have...a long life and low maintenance levels' proven? If there is no evidence this should be deleted.	This statement will be amended to state that 'in general, it is

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
				understood that solar panels have a long life and low maintenance levels.'
Paragraph 7.13 Ground Source Heat Pumps.	Representor: 159 Mr Roger Burton (jmarshitects)	Observations	<p>Regarding the power requirements for heat pumps. The statement 'The system does not require any external fuel' may be misleading although the paragraph does go on to state that the heat pump is powered by electricity.</p> <p>Clearly, the ultimate CO2 output of these machines does depend on the generation and transmission efficiencies of the electricity they consume although it is believed that the coefficient of performance of these machines, the three or four to one quoted, outweighs these inefficiencies such that the overall CO2 output per unit of heat will be less than that derived from on site use of fossil fuels or, by a considerable margin, direct use of electricity.</p> <p>It could be noted that if the source of electricity itself is low or zero carbon, either provided on or off-site, the heat provided by these units will be towards zero carbon.</p>	<p>The statement 'The system does not require any external fuel' will be deleted to avoid being misleading.</p> <p>Comments noted.</p> <p>This section will be expanded to state that if the source of electricity itself is low or zero carbon, either provided on or off-site, the heat provided by these units will be towards zero carbon.</p>
Paragraph 7.15 Wind	Representor: 159	Observations	The statement is correct that appropriate wind speeds	A reference will be

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
turbines.	Mr Roger Burton (jmarchitects)		are unlikely to be widespread in urban areas. It may be useful to add a reference to the DTI web site, which has a wind speed database, which gives an estimate, determined from postcode or map co-ordinates. Where considering installation of wind power, local measurements should always be taken. <a href="http://www.dti.gov.uk/energysources/renewables/renewables-explained/wind/windspeed-database">www.dti.gov.uk/energysources/renewables/renewables-explained/wind/windspeed-database</a>	made to the DTI website as suggested.
Paragraph 9.7 Considerate Constructors Scheme.	Representor : 159 Mr Roger Burton (jmarchitects)	Observations	<p>The Considerate Constructors Scheme is referred to in this section on minimising pollution. The Scheme also refers to other environmental issues such as the minimisation of waste and consumption of energy - extracts here:</p> <ul style="list-style-type: none"> <li>* Is material waste monitored and does the site receive feedback as to how much is recycled?</li> <li>* Have you considered using local suppliers and materials or using recycled materials?</li> <li>* Are energy saving measures in place? Is there a monitoring procedure?</li> <li>* Do you monitor carbon emissions from you site activities?</li> <li>* Have energy-saving light fittings been considered for the site accommodation and hoardings?</li> </ul> <p>Considerable energy is consumed and carbon dioxide produced in the construction process and particularly in travel to and from site for site operatives and for</p>	<p>The reference to the Considerate Constructors Scheme will be expanded to highlight its role in minimising waste and energy consumption.</p> <p>The SPD will be expanded to consider the need for green</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>deliveries of materials. Possibly this should be raised more explicitly in the text (and perhaps this should appropriately be in section 6) with requirements for green travel plans to be put in place which might, for instance, encourage the use of alternative, lower carbon transport to site for operatives and the better planning of deliveries, use of off-site fabrication etc. to limit the overall generation of carbon in the construction activity.</p>	<p>travel plans to encourage the use of alternative, lower carbon transport.</p>
Chapter 14 Minimising Construction Waste.	Representor : 12 Bruce Thompson (Ellesmere Park Residents Association)	Observations	<p>Section 14 correctly emphasises the amount of waste produced in the construction/demolition process. However, it lacks a commitment to presume against demolition, which is the ultimate in terms of wasted materials and energy. We are seeing cases of buildings only 20 years old being proposed for demolition.</p> <p>There should be a requirement for developers to prove that demolition is the only way forward, this proof should be in the public domain to validate it.</p>	<p>This section has been expanded to highlight the important role that the re-use of existing buildings and construction materials can play in minimising construction waste.</p> <p>National Planning Legislation does not require developers to justify why a building (except listed buildings and buildings in conservation areas) should be demolished.</p>
Paragraph 7.15 Wind turbines	Representor : 126 Nigel Openshaw	Observations	Wind Turbines - These should not be attached to walls and chimneys due to structural problems They should	The Council will amend the SPD to

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
	(Salford City Council)		be free standing 25m/s = 56MPH	state that wind turbines should not be attached to walls and chimneys due to structural problems and that they should be free standing 25m/s = 56MPH.
Paragraph 10.9 Reusing Water.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	Rainwater butts do become blocked with slime/ debris, and should be cleansed at least annually.	The need to cleanse rainwater butts at least annually to ensure they don't become blocked with slime / debris will be added.
Paragraph 10.11 Reclaimed Water.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	There can be blockage problems reusing bath water. Kitchen water should never be reused due to detergents/ food particles/ grease	The problems with using reclaimed water will be highlighted.
Paragraph 11.1 Surface Water Run Off.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	The maximum Greenfield run off allowed to watercourse/ public sewer should be limited to 7 L/s/Ha to Salford CC, Environment Agency, and United Utilities approval. For all developments, surface water run off should be minimal, and on Brownfield sites run off should be less than the original discharge where possible	The need to ensure that surface water run off is minimal and that it should be less than the original discharge where possible on Brownfield sites will be highlighted.
Paragraph 11.8 Infiltration trenches.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	EA approval required for large soakaways	The need for EA approval for large soakaways will be highlighted.

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
Paragraph 11.11 Swales and Basins	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	Drainage proposals for adopted roads should be agreed in advance. The EA may not allow highway run off to soak away.	The need to agree drainage proposals for adopted roads in advance will be stressed.
Paragraph 11.13 Ponds and Wetlands.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	Swales and Basins will not be adopted by the City Council, nor the Sewerage Undertaker due to long-term maintenance problems.	A sentence will be added to this section to state that swales and basins will not normally be adopted by Salford City Council, nor the sewerage undertaker as they often require long-term maintenance.
Paragraph 12.4 Minimising the Impact of Flood Events.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	Drainage arrangements and flood risk should be discussed with myself at the earliest opportunity.	The Council will stress the need to consult you at the earliest opportunity regarding drainage arrangements and flood risk.
Paragraph 16.6 Green Roofs.	Representor : 126 Nigel Openshaw (Salford City Council)	Observations	I am not happy with flat / green roofs as they are a maintenance liability	The Council will highlight the maintenance issues associated with green roofs in this section.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 162 Nicola Holmes (Network Rail (Infrastructure) Ltd)	Support	We would also support any promotion of public transport use as outlined within SPD: Sustainable Design and Construction.	The promotion of public transport as a sustainable form of transport will be

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
				highlighted in the SPD.
Paragraph 9.3 Ambient Air and Noise Pollution.	Representor : 162 Nicola Holmes (Network Rail (Infrastructure) Ltd)	Support	We would also support paragraph 9.3 on page 24 relating to the mitigation of noise, particularly in housing and other sensitive uses where it is located near to a railway line. Neighbour issues do arise from residential use being adjacent to an operational railway line and soundproofing techniques should be utilised.	The SPD advises that the mitigation of noise needs to be carefully designed into new development where it is located close to railway lines.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 95 John Litt (NW Regional Development Agency)	Observations	The draft SPD builds on relevant policies within the adopted Salford UDP by providing additional guidance on policy implementation to prospective developers. As such, they deal with detailed aspects of implementation and do not raise issues of a regional strategic nature.	Comments noted.
Paragraph 4.17 Regional Planning Policy.	Representor : 104 Paul Entwistle (North West Regional Assembly)	Observations	<p>The Adopted RSS Regional Planning Guidance for the North West (RPG13) now forms an integral part of the development plan and should be given due consideration when assessing planning documents. In addition the Submitted Draft Regional Spatial Strategy for the North West of England has now undergone a number of periods of consultation, with an Examination in Public which ended on the 15<sup>th</sup> February 2007. The panel report was published on the 8<sup>th</sup> May 2007. As the document is now somewhat progressed in the process towards its adoption, it should also be given some consideration when assessing planning documents.</p> <p>I have no detailed comments to make, only to suggest that paragraph 4.17 also includes reference to</p>	<p>We will state that RPG13 should be given consideration and the Draft RSS should be given some consideration when assessing planning applications.</p> <p>Policy DP1 in the Submitted RSS will</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>Submitted RSS DP1 which contains the same policy requirements for good design quality as Adopted RSS policy DP3.</p> <p>The Draft Green Infrastructure Guide for the North West provides a detailed definition of green infrastructure, as outlined in Policy EM3 of the Submitted Draft RSS. The guide offers broad advice on how to plan and enhance green networks.</p> <p>The NWRA (in association with a number of partners) have produced a Sustainability Appraisal Toolkit for use with a variety of strategies and development plans. The toolkit aims to ensure integrated plans and projects create sustainable developments within the North West.</p>	<p>also be referred to in the SPD</p> <p>We will refer to the Draft Green Infrastructure Guide for the North West.</p> <p>We will include a reference to the NWRA Sustainability Appraisal Toolkit.</p>
Policy 1	Representor : 53 Miss Gina Bourne (Home Builders Federation)	Object	The HBF objects to the list of requirements in this policy. Any specific standards for sustainable design and construction should be covered by the Code for Sustainable Homes, as this is a single national standard that the house building industry is working towards. There is a danger that new technologies may be introduced prematurely to address locally imposed requirements rather than using nationally proven methods. A proliferation of targets will harm the industry's ability to innovate, test, prove, and deliver in the numbers that we need to. It risks product and housing design failure, raising serious issues around warranties and insurance. In turn, it risks harming consumer confidence in both the process and the homes we deliver. Failure risks harming consumer confidence.	Until compliance with the code becomes mandatory, the Council, through this SPD and the development plan, will continue to encourage all developers to achieve high standards of design and construction.

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			The HBF needs local authorities to keep the Code timetable. It shares the aims of higher output and high performance standards, but it must be ensured that in achieving one of these, the other is not undermined.	Comments agreed.
Paragraph 5.4 Code Level 3 in the Code for Sustainable Homes.	Representor : 53 Miss Gina Bourne (Home Builders Federation)	Object	Whilst the HBF supports the Council's recognition of the Code for Sustainable Homes in this paragraph, it believes that it should be noted that the Code is voluntary at the moment and in accordance with the Code timetable Code Level 3 should be reached in 2010. Therefore, the Council cannot require that developments reach this level at this stage for the reasons stated above.	The SPD recognises the timetable for the Code for Sustainable Homes.
Paragraph 7.2 In accordance with the Government Consultation on the Climate Change Supplement to Planning Policy Statement 1, it is considered that it should be practicable in the vast majority of cases for new development to provide at least 10% of its energy supply.	Representor : 53 Miss Gina Bourne (Home Builders Federation)	Object	The HBF objects to the requirement in this paragraph for new development to provide at least 10% of its energy supply from on site renewable sources. The industry is serious about reducing the carbon footprint of housing and is supportive of the Code for Sustainable Homes as well as being a signatory to the 2016 Commitment. House builders are working to improve the energy efficiency of new housing and finding ways of incorporating energy efficient technologies (where relevant) in the design process. Especially as the higher levels of the Code for Sustainable Homes contain a requirement for on site renewable energy generation. However, the industry believes that the best way to improve the energy efficiency of new housing stock and to promote renewable energy is through innovations in materials and technology development and the economies of scale available to house builders to incorporate the best of these new technologies in the construction	The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1. The SPD will be amended to include reference to off-site renewable energy installations.

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>process, not by setting arbitrary targets that are impossible to measure. We feel that the prescription of minimum percentages for the incorporation of certain types of micro-renewable energy is neither constructive nor beneficial in helping to tackle the long-term challenges of climate change. Such an approach could fragment efforts to achieve economies of scale and prevent a concerted focus from the supply chain in developing the most promising new products efficiently.</p> <p>The generation of energy via micro-renewables will do little to help reduce carbon emissions (for many reasons, but not least because of the energy consumed by domestic appliances inside the home). The reduction of CO2 is best tackled through the design and construction of homes, improvements to the existing stock, changes in consumer preferences and individual behaviour and, at the macro-scale, through investment in cleaner power generation by Central Government.</p> <p>A plethora of micro-renewables spread across the UK's 26 million existing homes, needing regular cleaning, routine servicing (by people in vans) and eventual replacement after a couple of decades, strikes us as an inefficient use of resources. Moreover, many of these renewable technologies are in their infancy and are relatively untested. Only solar collectors are anything like a viable on-site option at the moment, all the other options currently available are expensive, inefficient and offer no security of supply in the longer term. This may adversely affect</p>	<p>It is agreed that efforts to reduce carbon emissions cannot rely solely on renewable energy technologies and efforts should also be made to improve the energy efficiency of buildings. However, it is considered that incorporating small-scale renewable energy projects in new developments can make a significant contribution to reducing CO2 emissions and PPS22 states that planning authorities</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>the saleability of housing schemes if people are wary of these untested technologies and the implication of break-down in the form of rising service charges or maintenance costs. These technologies will also add to the medium and long-term management costs of the socially rented sector. Redirecting the financial investment required to deliver this target for on site renewables to the buildings themselves, and the services in them, would increase their energy efficiency. It would deliver better energy savings and also allow buildings to benefit from larger scale renewable energy. This will ultimately save more carbon than the blinkered approach encouraged by the Merton rule.</p>	<p>and developers should consider the opportunity for incorporating renewable energy projects in <i>all</i> new developments.</p>
<p>Paragraph 11.4 SUDS.</p>	<p>Representor : 53 Miss Gina Bourne (Home Builders Federation)</p>	<p>Object</p>	<p>On the use of sustainable urban drainage systems (SUDS) these should be encouraged or sought where appropriate rather than be required in all circumstances as there remain unresolved difficulties in implementing them in certain circumstances. There are also outstanding problems and uncertainties regarding long-term management, which must be resolved before SUDS can reasonably be a pre-requisite for all development.</p>	<p>The SPD recognises that SUDS are designed to match local geological and hydrological conditions and that not all SUDS techniques will be appropriate for a particular site.</p>
<p>Paragraph 13.5 BRE Green Guide 2006.</p>	<p>Representor : 53 Miss Gina Bourne (Home Builders Federation)</p>	<p>Object</p>	<p>The HBF objects to the arbitrary targets that this paragraph sets out for construction materials. Again, these standards may not always be appropriate as it will depend on the development and the site conditions. The HBF believes that materials standards should be covered by the Code for Sustainable Homes.</p>	<p>This paragraph has been amended to require applications ensure that at least 3 or the 5 key elements of construction are specified to achieve a rating from A* to D in</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
				line with BRE Green Guide 2006.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 21 Mr. Kristian Marsh (Highways Agency)	Other	The Highways Agency are satisfied with the content of this document and we do not wish to suggest any changes	Comments noted.
Chapter 6 Minimising Energy Consumption.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	<p>The document states that in the majority of cases a 25% reduction in the Target Emission Rate [TER] (i.e. Code Level 3) should be sought. We believe this is an extremely onerous requirement for the majority of developers who are not currently prepared for this as it is not proposed to become a requirement of Building Regulations until 2010. We consider the SPD fall in line with Part L of the Building Regulations, which requires reduced energy consumption for dwellings and not the whole development.</p> <p>It is important to note that the Code for Sustainable Homes is not currently mandatory. Even if it becomes mandatory to assess a development against it in April 2008, it will not be obligatory to meet any of the levels until 2010, when it becomes integrated with Building Regulations. Care needs to be taken in achieving a balance between the fast-tracking of the introduction of standards and the requirement to meet standards not yet in force. This was recently agreed in the North West RSS EIP. The Panel Report confirms at paragraph 8.118 that: "FoE and CPRE wished to see 'promote' changed to 'require' (that various actions are taken). HBF, who otherwise supported the proposed policy, did not agree and the Assembly felt that - since the Code was as yet voluntary - it would not be</p>	<p>The Council will alter the wording to reduce the target in line with part L of the building regulations for dwellings, rather than the whole development.</p> <p>The SPD recognises the timetable for the Code for Sustainable Homes.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			possible to 'require' compliance with it. We accept this view".	
Chapter 7 Maximising the Provision of On Site Renewable Energy Supply.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	<p>The draft SPD considers that it should be practicable in the vast majority of cases for new development to provide at least 10% of its energy supply from on-site renewable energy sources or through connections to a renewable or low-carbon decentralised energy supply. We consider that seeking 10% renewables in addition to a 25% improvement on Building Regulations is unnecessary. The draft SPD seeks 10% of the whole development to be powered by renewables (i.e. including street-lighting &amp; traffic signals). Furthermore, we believe that this requirement, should only relate to dwellings. To achieve Code Level 3, renewable energy would have to be utilised on each property to significantly improve the TER. We therefore feel that this policy is unnecessary as it is likely to happen in any event.</p> <p>We therefore believe that Sections 6 and 7 should be merged because in order to gain a 25% improvement over TER, renewables will have to be incorporated into the development.</p>	<p>The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1.</p> <p>It is agreed that sections 6 and 7 cover related topics however, they will not be merged as the current layout is considered to best reflect guidance in PPS1 supplement Planning and Climate Change.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			All the examples of renewable energy should still be retained in this section; however a reference to Solar Thermal and Air Source Heat Pumps should be added.	Reference will be made to air source heat pumps and solar thermal.
Chapter 9 Minimising the Impacts of Ambient Air and Noise Pollution.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	<p>This section needs to be in line with Approved Document E 'Resistance to the passage of Sound'.</p> <p>We consider that paragraphs 9.6 and 9.7 should be merged. One of the aims of the Considerate Constructors Scheme is to minimise construction site impacts, and is therefore generally adhered to by developers.</p>	<p>We will state that requirements in this section should be in line with Approved Document E.</p> <p>These paragraphs will be merged as suggested.</p>
Chapter 10 Minimising Water Consumption.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	<p>The draft SPD requires applications for major development to incorporate a range of water conservation measures designed to reduce mains water usage. It states that in most circumstances it should be practicable to include measures to achieve a minimum standard of internal potable water consumption of no more than 105 litres per day per person in all residential developments. We note that 105 litres per day per person is equal to Code Level 3. Realistically, by incorporating the measures suggested within paragraph 10.7, only savings equivalent of 118 litres per day per person can be achieved, which roughly equates to Code Level 1.</p> <p>To achieve 105 litres per day per person, would require incorporating measures such as 4/2 litre dual flush toilets. As these are not currently readily</p>	<p>The water consumption figure will be revised to no more than 120 litres per day per person in all residential developments in light of the need for technological advancements.</p> <p>Some of the problems with 'greywater' solutions</p>

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			<p>available on the market, developers would need to consider a 'greywater' solution. This would cause significant problems for developers in terms of internal layouts and possibly sales problems (as customers tend to think of recycled water as old sewage water). Certain water authorities also do not support the idea of 'greywater' due to potential contamination issues.</p> <p>Countryside Properties currently provide water butts on our EcoHomes and Code for Sustainable Homes as part of our standard specification on both apartments and houses.</p> <p>We have concerns that problems may occur with heating systems as a result of water reductions, as Combination Boilers cannot fire up on 2.5 litres per minute flow restricted taps.</p>	<p>have been highlighted in this section.</p> <p>Comments noted.</p> <p>The water consumption figure will be revised to no more than 120 litres per day per person in all residential developments in light of the need for technological advancements.</p>
Chapter 11 Minimising the Speed and Quantity of Surface Water Run Off.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	This needs to be reviewed on a site by site basis as developments within the flood plain generally are required to discharge surface water in advance of the river flooding event arriving. On-site water attenuation in such cases is not desirable.	A comment will be added to this section to reflect the differing circumstances in flood plains.
Paragraph 13.5 BRE Green Guide 2006.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	We believe that paragraph 13.5 should be achievable for all developers; therefore the wording should be changed to 'The council will require applications...'	The SPD will be amended to 'The council will require applications...' as

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
				suggested.
Paragraph 13.6 Recycled Building Materials.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	With regard to paragraph 13.6, we feel that '10% of the total value of materials used should be derived from recycled content...' is not achievable as it would require infrastructure materials to be included. Materials such as concrete do not come with supplier's guarantees if made up from recycled aggregates. We therefore feel that adhering to the Green Guide and ensuring that three of the five key elements are rated from A* to D would be more realistic.	The wording of this paragraph has been amended to require applications ensure that three of the five key elements adhere to the BRE Green Guide 2006 Rating from A* to D.
Chapter 14 Minimising Construction Waste.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	Developers already seek to monitor and minimise construction waste in order to make financial savings therefore the submission of a Site Waste Management Plan to the Council should not be required. The draft SPD should otherwise contain flexibility to allow for situations where a Plan is being produced for other purposes to also be acceptable against this policy. For example, Countryside Properties currently produce similar plans for our sites subject to EcoHomes, BREEAM, and Code for Sustainable Homes Assessments. Whilst the format may differ slightly it is seeking to achieve a similar outcome and should be considered acceptable against the policy.	A statement will be added explaining that where it is not feasible for developers to produce a SWMP, it may be acceptable for other plans or documents to be submitted instead.
Chapter 15 Incorporating Adequate Waste Recycling Facilities.		Observations	Housing: Consideration needs to be given as to how many recycling bins can be held by a property in a rear garden; in situations where there is no rear garden bins can have an adverse impact on the street scene. The frequently the materials will be collected can also be an influencing factor.  Apartments: Communal chute systems for the separation of recyclable materials are not commonly	It is considered that sufficient flexibility is provided over the recommended number of household recycling bins.  The section about recycling systems for

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			<p>used; as such systems take up a lot of space. An alternative system that is used by Countryside Properties is for internal recycling bins to be placed in the kitchen (containing three ten litres bins). The occupier then takes the separated materials down to the communal bin-store, where four 240 litres communal recycling bins are provided.</p> <p>Composting: Composting bins or a composting collection service should be provided for houses and apartments.</p>	<p>apartments will be expanded to include details about internal recycling bins and communal bin stores.</p> <p>Details of composting bins and any collection service can be obtained from Salford's Waste Collection Authority, their contact details have been added as a footnote to this section.</p>
Paragraph 16.10 Nest boxes for birds and bats.	Representor : 124 Jane Aspinall (Countryside Properties)	Observations	<p>The draft SPD states that it should be practicable for all major developments to at least maintain the overall level of biodiversity, either through the provision of on-site habitats, or the improvement of off-site habitats and in many cases secure enhancements. Whilst green and brown roofs provide excellent insulation factors and absorb rainwater, when Code Level 3 is applied provision of these will be made more difficult due to renewable energy solutions that take up roof space.</p> <p>We suggest that paragraph 16.10 is amended slightly to include for bat boxes; as in our experience,</p>	<p>The issue of renewable energy solutions limiting roof space for green and brown roofs will be highlighted in the SPD. It is considered however, that these methods will be mutually compatible in many instances.</p> <p>The reference to bat bricks will be</p>

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			occupiers are not generally happy to have bat bricks built into their homes.	removed.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 123 Stephen Hedley (Natural England)	Support	We particularly welcome the attention given to adapting to and to reducing the contribution to climate change, as well as achieving the other benefits of more sustainable design and construction through the measures set out.	Comment noted.
Paragraph 3.3 Sustainable Design and Construction and the need for this document.	Representor : 123 Stephen Hedley (Natural England)	Observations	While paragraph 3.3 attempts to summarise national planning policy on delivering sustainable development, it over-summarises. In relation to 'Environment' it refers to maintaining and enhancing the quality of the environment 'both urban and natural'. National policy of course refers to the urban and rural environment, the built and natural environment. The text here should reflect this, and recognise that there are elements of the natural environment, including biodiversity, in urban areas.	The SPD will be amended to refer to the urban, rural, built and natural environments. The need to protect biodiversity will also be highlighted.
Paragraph 4.20 SPD Objectives .	Representor : 123 Stephen Hedley (Natural England)	Support	<p>We do of course strongly support the SPD objectives, paragraph 4.20, but consider that objective 8, which promotes sustainable forms of travel, should also include the provision of a convenient and safe walking environment.</p> <p>One of the objectives in paragraph 4.20 is to enhance the biodiversity and nature conservation interest of Salford, and we clearly support this. However, we also consider that an important aspect of sustainable design is the conservation and enhancement of local distinctiveness, through development which conserves and where possible enhances landscape or townscape character. While this is included within the</p>	<p>The SPD will be amended to include reference to the provision of a convenient and safe walking environment.</p> <p>The section on local policy will be expanded to highlight the relevance of the Design SPD and the importance of ensuring that measures to improve</p>

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			Design SPD we consider that a reference to this important aspect of sustainable design should be included also in the Sustainable Design and Construction SPD. This could be added to the objectives and some text added elsewhere in the document to make cross-reference to the conservation and enhancement of local landscape and townscape character	sustainability are not at the expense of the overall design quality of the development.
Chapter 16 Maximising the Provision of Wildlife Habitats.	Representor : 123 Stephen Hedley (Natural England)	Support	We support proposals aimed at maximising the provision of wildlife habitats (Section 16). Developments should rightly aim to conserve and enhance biodiversity, including the creation of new habitat.	Comments noted.
Chapter18 Summary Checklist.	Representor : 123 Stephen Hedley (Natural England)	Observations	<p>We found Section 18 'Summary Checklist' a useful means of ensuring that developers and others have considered the key issues in sustainable design and construction. However, in the questions opposite 'maximise the provision of wildlife habitats' we consider that the final question should be 'If any unavoidable losses of biodiversity are incurred, are mitigation measures in place and what are they?'</p> <p>Returning to our concern that some statement on the conservation and enhancement of landscape and townscape character should be included in this document, that aim should be included in Section 18 together with appropriate questions.</p>	<p>In the summary checklist, the following question will be added as suggested 'If any unavoidable losses of biodiversity are incurred, are mitigation measures in place and what are they?'</p> <p>The effect of all development on conservation and enhancement of landscape and townscape character is assessed as a</p>

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			<p>Include reference to Habitats Regulations Screening, explain how this has been considered and undertaken, together with conclusions. 'In-combination effects' with other plans and projects also need to be considered. If there are unlikely to be significant effects on any European designations this should be set out and explained.</p>	<p>matter of course.</p> <p>Further information on habitats and habitat management is provided in the Council's SPD on Nature Conservation and Biodiversity.</p>
<p>SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.</p>	<p>Representor : 174 Jean Johnson (Lancashire Branch of CPRE)</p>	<p>Observations</p>	<p>The document on sustainable construction states its objectives as follows: "To ensure that future development minimises its environmental footprint, is economic to run over its whole life cycle and fits well with the needs of the local community by focussing on adaptations to climate change, minimising future contribution to climate change, securing a more efficient use of resources and reducing waste. The subjects covered in this guidance range from minimization of energy use, to the reduction of waste in construction and the conservation of water to ensure that winter rains, previously flushed down the drains as quickly as possible (often resulting in flooding) are available during the drier summers which climate change is predicted to bring. These, and many other aspects of our dwindling resource base, are dealt with in great detail in this SPD and users of the guidance are provided with references to legislation and national planning guidance, together with examples of the implementation of the techniques described.</p> <p>The most notable aspects of this document, however,</p>	<p>Comments noted.</p> <p>Comments noted.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			<p>is the way in which it relies on natural systems to mitigate the predicted effects of climate change whilst conserving natural resources and reducing CO2 emissions from energy generation. Examples are the orientation of buildings so that sunlight can reduce heating and lighting costs, the opening up of the River Irwell both to reduce future flooding risk and to moderate the higher temperatures of urban areas which will be exacerbated by future climate change and the use of tree planting both to provide shady areas outside and to reduce the need for air conditioning inside homes and offices.</p>	
<p>SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.</p>	<p>Representor : 174 Jean Johnson (Lancashire Branch of CPRE)</p>	<p>Observations</p>	<p>In this document, devoted to sustainable construction, there is no reference to the carbon dioxide emissions caused by the process of manufacturing cement and concrete, calculated recently at 5% of the total of all global emissions of CO2. There is, therefore, no real discussion of alternative construction materials. Perhaps this omission could be covered more fully in future guidance?</p>	<p>The SPD provides further advice regarding sustainable construction materials and makes reference to requirements in the Code for Sustainable Homes.</p>
<p>SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.</p>	<p>Representor : 174 Jean Johnson (Lancashire Branch of CPRE)</p>	<p>Observations</p>	<p>There is no reference to the amount of electricity which flat and apartment dwellers are obliged to consume when they have no outdoor drying facilities. Providing outdoor clothes drying facilities should be a further requirement for developers building apartments together with, perhaps, a communal dehumidifier room for use in wet weather. Dehumidifiers are more economical in the use of electricity than tumble dryers.</p>	<p>It is agreed that outdoor drying facilities can reduce the need to consume energy. However, it is not always feasible to provide such space and this should be considered on a site-by-site basis.</p>

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SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 174 Jean Johnson (Lancashire Branch of CPRE)	Observations	The fashion for paving over gardens is likely to have played a considerable role in the flooding which has occurred in recent years. Hopefully it can be reversed as people realize the consequences. However, many gardens are paved over by older people when they are no longer able to look after them themselves. The provision of gardening assistance by the local authority to older people could, therefore, be effective in reducing one of the potential causes of flood risk.	It is not within the scope of this document to prevent people from paving over their gardens. Similarly, the remit of the SPD does not extend to providing gardening assistance to older people.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 174 Jean Johnson (Lancashire Branch of CPRE)	Observations	The policies set out in the sustainable construction document to minimize energy use, and the selective use of appropriate micro generation techniques, for example the siting of photovoltaic panels on roofs and walls where they do not create the usual blight, will all result in the reduction of Salford's CO2 emissions in compliance with the Government policy of reducing same by 60% by 2050. However, locating large wind turbines, whose current height is around 500 feet, on Salford's rural areas, or siting small micro generating wind turbines on beautifully designed or listed buildings, would create noisy, inefficient and short-term solutions to the problem of reducing CO2. Instead, Salford should follow through its policies, such as those on water conservation, and rely on the attractive, natural, and long term means provided by nature itself. Policy EN11 of the Salford UDP (Mosslands) sets out policies for conserving and restoring, where necessary, Salford's lowland raised peat bog habitats for their landscape and nature conservation value. This is in accordance with both the Regional Spatial Strategy for the North West, which	Salford's supplementary planning document on Nature Conservation and Biodiversity contains further guidance in relation to protecting peat bogs.

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			<p>sets a target of improving 1,000 hectares of degraded peat bog by 2015, and with the Greater Manchester Biodiversity Plan. Lowland raised peat bog (and in the uplands, blanket peat bog) is not, however, solely a primary nature conservation habitat, it is also a means of removing CO2 from the atmosphere and storing it indefinitely, for it is a carbon sink. Such carbon sinks are among the largest resources on earth of trapped CO2 and consequently, if the peat, of which they consist, is damaged through inappropriate developments, they have the greatest potential for releasing CO2 to the atmosphere. The potential of lowland raised peat bogs and blanket bog for reducing, or conversely if damaged, increasing atmospheric carbon dioxide, is acknowledged in the Planning and Climate Change Supplement to PPS1 at paragraph 10 –“Integrating Climate Change”. This draft policy requires Regional Planning Authorities in drafting their Regional Spatial Strategies (RSS) “to recognise the potential of, and encourage those land uses and land management practices that help to secure carbon sinks”. In effect, the RSS should encourage and local authorities should implement those policies already adopted in the UDP for the protection, conservation, and restoration of peat bogs. When considering further action on reduction of Salford’s CO2 emissions, the beneficial effects achieved through the protection and restoration of the lowland raised peat bog should be given priority over temporary, expensive, and often ugly renewable energy technology.</p>	

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SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 174 Jean Johnson (Lancashire Branch of CPRE)	Observations	<p>In 1974 - at the time of the Arab oil embargo, people in Britain really thought that the era of the car was about to come to an end, and they pictured with excitement the possibilities of a car-less society. Unfortunately, the car age had still a long time to run, but as oil reserves dwindle, possibilities are becoming actualities, particularly in Salford, the self-proclaimed city of the future, whose Sustainable Design plan begins to design out the car. Of necessity, in a car-less society, people will need to live closer to their place of employment, thus reducing the working day - by hours in some cases. And their method of travel to work will be walking or cycling through green streets and along the side of a river, which meanders across a meadow. As the city spaces, once claimed by vehicles, are reclaimed the people, Salford's rural areas will extend into the city centre itself, providing tree-sheltered areas where people can sit outside on hot summer evenings and where wildlife will thrive in the new car-less centre.</p> <p>I hope that Salford's vision for this future inspires other cities to follow their lead and thus bring to an end the perpetual wars, which continued reliance on oil will inevitably bring.</p>	Comments noted.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 174 Jean Johnson (Lancashire Branch of CPRE)	Observations	<p>No city is an island entire unto itself... and Salford, notwithstanding the greening of the city and the reduction of its environmental footprint, will remain dependant on the real countryside, which the then Council for the Protection of Rural England was set up to protect from the ravages of the ever-expanding cities in the 1930s. Policies to reduce the need for construction materials and to re-use, reduce and</p>	Comments noted.

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			<p>recycle waste will obviously have a positive effect on the countryside where such minerals are quarried and waste is buried. Nevertheless, construction in the city will still rely on minerals brought there on large trucks travelling along motorways running through the countryside and hazardous waste will still end up being buried under rural areas. And food and manufactured goods will still enter the city in juggernauts travelling from other parts of the country and other parts of the world. Similarly, the measures which minimize Salford's energy use, will not remove the need for electricity entirely, so the pylons will continue to march across the countryside accompanied by the ubiquitous mobile phone masts, whilst in a nuclear future, the reactors and repositories for the resultant nuclear waste will be sited in remote areas of the countryside, away from centres of urban population. It is clear from the above, that whilst Salford's efforts to reduce the city's environmental footprint are much to be admired, they are likely to result in a bizarre reversal of the past. Unless steps are taken to reduce its environmental footprint outside the city as well as within, the greening of the city may well be accompanied by the industrialization of the countryside.</p>	
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 71 Rose Freeman (The Theatres Trust)	Other	The Theatres Trust does not have any particular comment to make.	No change required.

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Paragraph 4.13 Compliance with the Code for Sustainable Homes.	Representor : 93 Mr David Hardman (United Utilities)	Support	The Code for Sustainable Homes includes potable water efficiency measures and United Utilities supports the Code.	Comments noted.
Policy 1	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports the wording of this policy and particularly items: e, f and g: •e minimise water consumption •f minimise the speed and quantity of surface water run-off •g minimise the impact of flood events	Comments noted.
Chapter 10 Minimising Water Consumption.		Observations	All this section is extremely well informed and Salford is in the forefront of 'green' issues.  However, United Utilities would differ on the potential uses of rainwater and greywater recycling. United Utilities recognizes that there is a lot of interest in grey water recycling and/or rainwater harvesting. A lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use. The proposal to use rainwater/greywater in these ways is most commendable but when the full implications of dual plumbing systems, pumping and disinfection requirements are considered the sustainability of such processes is questionable.	Comment noted.  The SPD will be expanded to highlight some of the problems associated with using reclaimed water.

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Paragraph 11.7 Previous Pavements.	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports the principle of pervious pavements	Comments noted.
Paragraph 11.15 Green Roofs.	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports the principle of green roofs.	Comments noted.
Paragraph 11.17 Grey Water.	Representor : 93 Mr David Hardman (United Utilities)	Observations	United Utilities recognizes that there is a lot of interest in grey water recycling and/or rainwater harvesting. A lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use.	The SPD will be expanded to highlight some of the problems associated with using reclaimed water.
Chapter 18 Summary Checklist.	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports measures to minimise water consumption by water saving devices and water meters.	Comments noted.
Chapter 18 Summary Checklist.	Representor : 93 Mr David Hardman (United Utilities)	Object	We cannot endorse the use of greywater recycling.	The checklist has not been amended as greywater systems are still being encouraged where appropriate.
Chapter 18 Summary Checklist.	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports the principle of SUDS.	Comments noted.

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Chapter 18 Summary Checklist.	Representor : 93 Mr David Hardman (United Utilities)	Support	United Utilities supports consideration of issues raised in Flood Risk and Development Planning Guidance.	Comments noted.
Chapter 4 Policy Context and SPD Objectives.	Representor : 121 Helen Barrett (Environment Agency)	Observations	PPS9 encourages the provision of new nature conservation features beyond the requirements for mitigation or compensation. Paragraphs 1(ii) and 5(ii) state that policies should aim to restore or add to biodiversity interests. Paragraph 14 states that the opportunities for building-in biodiversity features should be maximised. Such improvements can provide valuable enhancement to the living and working environment of the Borough.	Comments noted.
Paragraph 4.12 Code for Sustainable Homes.	Representor : 121 Helen Barrett (Environment Agency)	Observations	One of the core factors in assessing the sustainability of homes as part of the Code for Sustainable homes is ecology, as well as surface water run-off, water efficiency, and this should be clearly indicated.	The SPD will be expanded to stress the importance of ecology in assessing the sustainability of homes.
Paragraph 6.11 Existing trees and new landscape planting.	Representor : 121 Helen Barrett (Environment Agency)	Observations	There needs to be adequate provision as part of any landscaping scheme, to allow any planting to obtain maturity with impinging or affecting neighbouring development, and this should be clearly stipulated in this section of the SPD.  Flora locale is a registered charity that encourages, across Britain and Ireland, the wise use of wild plants for planting schemes, and provides guidance and advice on sourcing of locally provenanced plants ( <a href="http://www.floralocale.org/default.asp">http://www.floralocale.org/default.asp</a> ).	It will be highlighted in the SPD that planting needs to reach maturity without impinging or affecting neighbours.

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Paragraph 7.9 Solar Panels.	Representor : 121 Helen Barrett (Environment Agency)	Observations	Solar power does not only have to be restricted to buildings themselves, i.e., solar lighting is another use that can reduce the carbon footprint of a new build.	The SPD will be expanded to include reference to solar lighting.
Paragraph 8.8 Extensive areas of hard-surface.	Representor : 121 Helen Barrett (Environment Agency)	Observations	Extensive areas of hard standing should be avoided where feasible to more sustainable alternatives such as porous pavement, geo-grids etc. which have wider sustainable development aspects such as landscape value, reduction in flood risk, run-off etc.	The SPD will be amended to refer to these additional issues.
Paragraph 10.9 Reusing Water.	Representor : 121 Helen Barrett (Environment Agency)	Observations	Retention ponds as one of the suite of SUDs options could be used as a rainwater storage facility, but also have added landscape, flood risk and biodiversity benefits.	The use of retention ponds as a rainwater storage facility will be highlighted in the SPD.
Paragraph 11.6 Surface Water Run Off.	Representor : 121 Helen Barrett (Environment Agency)	Observations	The Environment Agency SUDs link is worth referring to as part of the design document. ( <a href="http://www.environment-agency.gov.uk/business/444304/502508/464710/464914/?lang=_e">http://www.environment-agency.gov.uk/business/444304/502508/464710/464914/?lang=_e</a> ).	The Environment Agency SUDs link will be incorporated into the SPD.
Paragraph 11.15 Green Roofs.	Representor : 121 Helen Barrett (Environment Agency)	Observations	There are wide range of green roof systems available, including brown roofs that just use rock and other soil substrate instead on plant matter, which has greater wildlife value for specialists such as certain insects and black redstarts (which is a BAP species in the Greater Manchester Biodiversity Strategy). Useful independent advice can be obtained from ( <a href="http://www.livingroofs.">http://www.livingroofs.</a> ) and the wide range of options green roofs offer for small or large scale developments.	Comments noted. The SPD will be expanded to include reference to brown roof systems and the Living Roofs website link will be provided as suggested.

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Chapter 12 Minimising the Impact of Flood Events.	Representor : 121 Helen Barrett (Environment Agency)	Observations	We would recommend that developers are referred to our national standing advice on flood risk which can be found at <a href="http://www.pipernetworking.com">http://www.pipernetworking.com</a>	Reference will be made to the Environment Agency website in the SPD.
Paragraph 13.2 Responsibly sourced materials.	Representor : 121 Helen Barrett (Environment Agency)	Observations	Embracing sustainable design and construction principles can also have far reaching impacts on biodiversity at a local, national and international level e.g. by using timber from sustainably managed forests or avoiding use of peat products.	The SPD will be expanded to highlight the benefits of sustainable design and construction in terms of biodiversity.
Chapter 16 Maximising the Provision of Wildlife Habitats.	Representor : 121 Helen Barrett (Environment Agency)	Observations	<p>There are opportunities within many development proposals to create, manage, and enhance wildlife habitat and the natural landscape. Habitat creation and enhancement towards the achievement of targets within the Greater Manchester Biodiversity Action Plans should also be encouraged through the planning process.</p> <p>There needs to be a clear emphasis in the SPD to get planners and developers to actively assess the feasibility of incorporating new environmentally sympathetic techniques at the earliest possible stage in the planning process.</p>	<p>The SPD will be altered to encourage the achievements of targets within the Greater Manchester Biodiversity Action Plans.</p> <p>The benefits of incorporating new environmentally sympathetic techniques at the earliest possible stage in the planning process will be stressed.</p>
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 142 Nick Scott (The Emerson Group)	Observations	As a major stakeholder in the Borough of Salford, The Emerson Group understands the importance of sustainable design and construction in new developments in the Borough, however we believe that the options provided in this document could	It is acknowledged that Building Regulations are expected to change to meet the

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			<p>potentially be too onerous on developers. At the present time there are general, national concerns regarding the somewhat disjointed relationship between Building Regulations and planning policy (in reference to SPD's such as this); and also the relationship of these with the emerging Code for Sustainable Homes.</p> <p>The Code for Sustainable Homes already identifies national objectives and targets for the construction of new dwellings beyond the requirements of Building Regulations. The consultation supplement to PPS.1 titled Proposed Planning Policy Statement: Planning and Climate Change, states in Paragraph 31 that; "Planning authorities should not need, however, to devise their own standards for the environmental performance of individual buildings as these are set out nationally through the Building Regulations. Higher standards for new homes are set out in the Code for Sustainable Homes. Where planning authorities wish to require higher levels of building performance, because of local development or site specific opportunities, the expected local approach should be set out in advance in a development plan document. For new homes, local standards should be based on the Code for Sustainable Homes..." Also paragraph 38 states:- "It is not necessary to use planning conditions to control those aspects of a building's construction and fittings that will be required to be in place to meet environmental standards set through the Building Regulations. Planning conditions or planning obligations should be used to secure the longer-term management and maintenance of those aspects of a</p>	<p>requirements of the Code for Sustainable Homes. This SPD does not require developers to meet standards higher than statutory requirements.</p>

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			<p>development required to ensure compliance with the policies in this PPS.” These two paragraphs question the relevance and need for this proposed SPD particularly when the majority of criteria are already regulated through Building Regulations or acknowledged in the Code for Sustainable Homes. It also highlights that local standards should be incorporated within a DPD rather than an SPD.</p> <p>Building a Greener Future – Towards Zero Carbon Development explains that there needs to be clarity about the relationship between: Planning policies – which regulate the location, siting and design of development; and Buildings Regulations which deal with conservation of fuel and power, health and safety, accessibility in buildings; and the Code which addresses sustainability in homes. The Government would wish to minimise any overlap between the sets of policies, however the creation of SPD’s such as this one do generate overlaps that become confusing and may not correlate with each other.</p> <p>In addition to our apprehension over the need for this document, there is concern over the ability of Building Regulations to adapt its practices in line with the SPD and increasingly rapid, evolving standards. Building Regulations will evolve in line with the requirements of the Code for Sustainable Homes however it is felt that imposing higher requirements, beyond those scheduled within the Code at a premature stage will place increased burdens upon Building Regulations as they could struggle to adapt quickly enough to new construction techniques and developments in</p>	<p>As above.</p> <p>The SPD encourages rather than imposes requirements on developers to reach higher requirements but allows developers to justify where requirements have not been met.</p>

Original Paragraph/Policy	Respondent	Nature of Response	Representation	Council's Response
			materials. The need for appropriate phasing of such standards is deemed essential. The issue of timing is also one that applies to the SPD directly as it is envisaged that the document could rapidly become outdated as advancements in technology and materials are made, leading to the formal requirements contained within this SPD becoming obsolete. At present, some of the requirements of this document are extremely difficult to implement, if not impossible, regardless of costs, (more details of which are listed below).	
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 142 Nick Scott (The Emerson Group)	Observations	With the general concerns demonstrated (see general comments), the need for formal requirements of energy efficiency (Para 6.1) and on-site renewable energy (Para 7.2) are deemed contrary to the Draft Supplement to PPS1.	The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1. The SPD will be amended to include reference to off-site renewable energy installations.
SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.	Representor : 142 Nick Scott (The Emerson Group)	Observations	It is apparent that the content of and relationship between Chapters 6 and 7 of the SPD should be fully considered. Paragraph 7.4 touches on the relationship with regard to the need to consider both energy efficiency and renewable energy together, and it is recommended that further work be undertaken to establish a closer interrelationship between these two separate proposed policies.	It is agreed that sections 6 and 7 cover related topics however, they will not be merged as the current layout is considered to best reflect guidance in PPS1 supplement Planning and Climate

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				Change.
Chapter 7 Maximising the Provision of On Site Renewable Energy Supply and/or Connections to a Decentralised Low-Carbon Energy Supply.	Representor : 142 Nick Scott (The Emerson Group)	Observations	It is noted that within Chapter 7 there is no mention or consideration of the use of off-site renewable energy or the potential for carbon trading. Further consideration should be given to these alternatives.	The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1. The SPD will be amended to include reference to off-site renewable energy installations.
Paragraph 10.1 Water Conservation.	Representor : 142 Nick Scott (The Emerson Group)	Observations	Paragraph 10.1 of Chapter 10: Minimising Water Consumption, details that no more than 105 litres of water per day per person should a minimum standard, equivalent to a Code 3 rating under the Code for Sustainable Homes. This requirement is unachievable at present as the technology to do so is not readily available. It is recommended that an increased figure be considered that is attainable.	The requirement has been amended to 120 litres per day per person in all residential developments.
Paragraph 10.3 Water Saving Measures.	Representor : 142 Nick Scott (The Emerson Group)	Observations	Paragraph 10.3 states that evidence will be required to demonstrate that full consideration has been given to the potential for the use of water saving measures including the use of reclaimed water. Whilst providing evidence of this nature in instances when requirements cannot be met is not an issue, this opportunity is taken to highlight that presently greywater and rainwater recycling systems are costly to not only purchase, but also will generate significant issues when designing their inclusion within the fabric of a building. As such consideration must be given to paragraph 23 of the draft supplement to PPS.1 entitled	The current issues associated with greywater will be raised in the SPD.

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			<p>“Proposed Planning Policy Statement : Planning and Climate Change” whereby planning authorities should:-</p> <ul style="list-style-type: none"> <li>•Have regard to the overall cost of bringing sites to the market and the desirability of avoiding any adverse effect on the development needs of communities.</li> <li>•Make realistic assumptions on the availability of renewable and low-carbon technologies and applicable thresholds for their viable delivery.</li> </ul>	
Chapter 11 Minimising the Speed and Quantity of Surface Water Run Off.	Representor : 142 Nick Scott (The Emerson Group)	Observations	It is noted as an important consideration for the Borough in that parts of the Borough are prone to flooding. However, Chapter 11 fails to recognise the issues faced between differing forms of development and their potential impacts on surface water run off. In particular, in instances of high rise development, it is increasingly difficult to incorporate measures to reduce run off when the buildings footprint may be either very small or heavily restricted by existing development or infrastructure. Whereas lower density schemes may be able to incorporate increased measures to assist in surface water run off via the inclusion of greater areas of green space and more or less permeable surfaces	The council considers that most developments should be able to incorporate measures to ensure that there is not net increase in the speed or volume of surface water run-off. Links are provided to two websites to provide further guidance on SUDS.
Paragraph 13.6 Recycled Building Materials.	Representor : 142 Nick Scott (The Emerson Group)	Observations	Paragraph 13.6 of Chapter 13: Maximising the Use of Responsibly Sourced and/or Recycled Building Materials states that developments in excess of a designated size will be required by the Council to include at least 10% of the total value of materials used should be derived from recycled content in the products and materials selected. This requirement is deemed to exceed what is necessary in accordance with PPS1, and as such this requirement should be omitted from the SPD. We would also question who	The suggested percentage of on-site renewables has been removed in line with the revised Supplement to PPS1. The SPD will be amended to include reference to off-site renewable energy

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			would determine that 10% of the total value of materials were from recycled sources? In addition, materials can and often do change after planning permission is granted subject to approval from the LPA. Any such requirement would need to provide flexibility to accommodate such changes.	installations.
Chapter 14 Minimising Construction Waste.	Representor : 142 Nick Scott (The Emerson Group)	Observations	<p>Chapter 14: Minimising Construction Waste is accepted as being an important issue amongst developers, with the emergence of SWMP's within PPS10. However from the information provided within the SPD it is unclear as to how SWMP's would be formally requested (i.e. via planning condition?), managed, and monitored by the Authority. In many instances, larger developers have their own procedures in place for the recycling and minimisation of site waste and it is felt that problems could arise via the introduction of increased third party involvement whether that be the Authorities Planning Department or Building Regulations.</p> <p>WRAP already produces best practice guidance on matters of construction waste minimisation and management and it is recommended that the Authority consider this policies potential relationship with existing WRAP guidance.</p>	<p>Flexibility will be given so that developers that have their own plans and procedures in place for the recycling and minimisation of site waste will be able to use this instead of producing a SWMP.</p> <p>Reference has been made to WRAP in the SPD.</p>
Paragraph 15.7 Incorporating Adequate Waste Recycling Facilities.	Representor : 142 Nick Scott (The Emerson Group)	Observations	Paragraph 15.7 details requirements for the external storage of up to 4 wheeled bins in the case of dwellings with gardens, or 3 in dwellings without gardens. This requirement is deemed to be excessive and would no doubt generate potential safety hazards, whether that be within the curtilage of the dwelling or whether it be adjacent to the highway on collection	It is considered that sufficient flexibility is provided regarding the number of large wheeled bins required per dwelling. Further details can be

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			<p>days. It is felt that a waste collection strategy should be produced by the Environmental Services Department and then this can inform future planning documents with regard to waste and recycling facilities and collection. With the requirement for ever increasing housing densities, the accommodation of 3 or 4 large wheeled bins per dwelling is deemed unviable.</p>	<p>obtained from the Council's Waste Collection Authority and their contact details are provided in the SPD.</p>
<p>Paragraph 19.3 Monitoring.</p>	<p>Representor : 142 Nick Scott (The Emerson Group)</p>	<p>Observations</p>	<p>Paragraph 19.3 refers in bullet 3 to 'water consumption of no more than 120 litres...'. It is recognised that this is an error and in fact should be 105 litres as in accordance with paragraph 10.1. However following comment above regarding paragraph 10.1 the figure of 120 litres is acknowledged as an improvement and certainly more attainable.</p>	<p>The intended figure of 105 litres has now been amended to 120 litres.</p>
<p>Paragraph 15.3 Incorporating adequate waste recycling facilities, which will need to be designed to incorporate uncomplicated collection and storage facilities.</p>	<p>Representor : 102 WM Morrison Supermarkets Plc Agent : 101 <i>Peacock&amp;Smith (on behalf of Wm Morrison Supermarkets Plc)</i></p>	<p>Observations</p>	<p>Waste Recycling Facilities in New Development The comments relate to Section 15.3. The text states that the Council will "expect" new developments to incorporate waste recycling facilities. Our client is certainly not adverse to the principle of including recycling facilities, as they have a long established practice of this in their foodstores. However, the policy stance is a little vague and should clarify what sorts of recycling facilities may be required in such developments. The requirements for facilities should in no way be onerous so as to constitute a large proportion of a site area, which will undoubtedly impact on other site elements, such as provision of adequate parking facilities. They should, therefore, be proportional to the development and any provision should be in consultation/negotiation with the</p>	<p>The Council consider that the guidance regarding waste recycling facilities is sufficiently flexible. Further guidance and assistance can be obtained from the Council's Waste Collection Authority and their contact details are provided in the SPD.</p>

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			<p>developer and LPA, as appropriate. Linked to this, the text takes no account of the level and types of recycling facilities that may already exist within a locality. For instance, if there is sufficient existing provision within an area, by expecting that a developer include such facilities, this will also clearly be an unnecessary use of land and place in undue requirement on a developer. The text also makes no reference to extensions to existing operations, which may be considered as major new development. Such a requirement for recycling facilities should not necessarily apply, especially where these are provided already. The text should make explicit reference to new development and not to extensions. As a final point, such facilities may also give rise to unacceptable amenity issues, especially on sites where housing is located in close proximity. In summary, we consider that Section 15 of the SPD relating to waste recycling facilities should be amended to have greater flexibility and ensure that such facilities are provided where there is a genuine need, and where they may be accommodated without impact on the operation of the development, or the amenities of the general public.</p>	
<p>SALFORD CITY COUNCIL SPD: Sustainable Design and Construction.</p>	<p>Representor : 31 Phill Lally (GONW)</p>	<p>Observations</p>	<p>You will be aware that PPS12 indicates that all matters covered in supplementary planning documents must relate to policies in a development plan document or a saved policy in a development plan. The approach you have taken in the above documents is to list the relevant saved plan policies towards the start of the documents but it is not clear which parts of the SPDs relate to specific saved plan policies. This needs to be</p>	<p>The SPD has incorporated clear references to the UDP policy which each chapter supplements.</p>

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			<p>rectified by cross-referencing the matters covered in the SPDs to the actual saved plan policies, which they are supplementing. Providing this can be done, we would have no objection to the adoption of these two SPDs. We would, though, wish to see how you propose to do this prior to adoption.</p> <p>It is not clear why the Council is producing two SPDs covering design issues. I would be much more helpful to produce a single document setting out guidance on design. The question of sustainable design and construction must surely be central to any guidance on design and it should not be separated out in this way. We would strongly recommend combining and integrating the two documents.</p>	<p>The two SPDs are considered to provide supplementary guidance on very different aspects of design. One relates to the contribution to a broad range of sustainability issues and the other provide overarching guidance on how buildings and places will look. Reference to the Design SPD will be made in this SPD.</p>
Chapter 15- Incorporating Adequate Waste Recycling Facilities- Paragraph 15.3	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	Liveability division of the Environment Directorate will give help and advice on the containers and service to be provided once the plans have been seen and approved by officers from the Directorate.	Reference to the additional support of the Liveability Division and contact details have been included.

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Paragraph 15.4 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	<p>Recycling and waste collections to be offered in line with current services offered by the Environment Directorate.</p> <p>Collection services and methods used are subject to change and that reference should be made to the planning advice note issued by Environment. This is to be updated by ourselves and kept as a stand-alone document. This ensures that all information contained in this document is relevant and made available to those who request a copy.</p> <p>We are also ok with you putting my email address on your document so that developers have a contact. Instead of referring them to the Call Centre who only pass their details on to me, this encourages the use of online applications as outlined in your document.</p>	<p>The SPD will be expanded to state that collection services and methods used are subject to change and that reference should be made to the planning advice note issued by Environment.</p> <p>Your email address will be included in the document.</p>
Paragraph 15.6 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	<p>Omit the number of recyclates currently collected. This again, is liable to change - but amend to say on 2nd item - all brown cardboard, grey board and paper products. 3rd item - all glass bottles and jars, omit the reference to clothes and shoes and also change to say all office paper, envelopes, junk mail, newspapers and catalogues. Salford City Council are the waste collection authority and this list is liable to change subject to instructions from our current waste disposal authority.</p>	<p>The SPD will be amended to omit the number of recyclates currently collected and include references to all brown cardboard, grey board and paper products for the second item and all glass bottles and jars for the third item. The reference to clothes and shoes will be omitted and</p>

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				also changed to say all office paper, envelopes, junk mail, newspapers and catalogues. We'll also state that Salford City Council is the waste collection authority and this list is liable to change subject to instructions from our current waste disposal authority.
Paragraph 15.8 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	Please make reference to our garden waste recycling collection service.	The garden waste recycling collection service will be referred to at the end of this section.
Paragraph 15.11 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	Please insert - The management company to ensure no contamination of residual waste in the recycling bins/containers provided.	The text 'The management company to ensure no contamination of residual waste in the recycling bins/containers provided.' will be inserted in the SPD.

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Paragraph 15.12 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	Item 4 - add - if no management company then the residents are solely responsible for maintaining the bin areas, for the maintenance of the bins themselves and placing of the bins ready for collection on the appropriate day and their return, the same day, back to the bin areas.	The SPD will be expanded to state that if there is no management company then the residents are solely responsible for maintaining the bin areas, for the maintenance of the bins themselves and placing of the bins ready for collection on the appropriate day and their return, the same day, back to the bin areas.
Paragraph 15.13 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	Please make reference to our garden waste recycling collection service as an alternative to the composting option	The garden waste recycling collection service will also be referred to in the SPD.
Paragraph 15.15 Incorporating Adequate Waste Recycling Facilities.	Internal Consultee Beverley Lydiate (Commercial Contracts Development Offices) Salford City Council	Observation	With regard to the section on non-residential developments omit the statement in 15.15 as each volume and type of waste is dictated by the type of business carried out on the premises. We are able to offer advice, if needed, by developers who are considering this type of development.	The statement will be omitted and a statement added explaining that the Environmental Services Department are able to offer advice, if needed, by developers who are

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				considering this type of development.
Para. 17.4 Cycle Parking.	Internal Consultee Darren Findley (Strategic Transport Manager) Salford City Council		Is there an opportunity here to improve on the cycle parking standards that are listed in the UDP i.e. instances in Central Salford locations. Might there be a statement to the effect that - where we are content to relax the need for residential car parking provision, we would expect to strengthen the provision of cycle parking. Perhaps we should, say, require the sum of car parking and cycle parking provision to at least equal the number of flats / dwellings?	As this document is an SPD, rather than a DPD, it is not possible to impose new standards.
Para. 17.9 Cycle Lanes.	Internal Consultee Darren Findley (Strategic Transport Manager) Salford City Council	Observation	<p>This paragraph could make reference to our COPECAT audit system, &amp; make reference to the webpage. However, the COPECAT documents are only available on our intranet, so they would need including somewhere on our Council website. COPECAT is currently available at:  <a href="http://intranet.salford.gov.uk/housing-planning/planning-homepage/devs-copecat.htm">http://intranet.salford.gov.uk/housing-planning/planning-homepage/devs-copecat.htm</a></p> <p>I think that, just as we're stating the sort of provisions that we'd expect for cyclists, we should also be stating what we'd expect for pedestrians, such as including pedestrian routes to/from the public highway, the opportunity for pedestrian improvements to the local highway, crossings, etc. This is particularly relevant where we are anticipating to encourage more trips by public transport, since walking is always the first &amp; last element of such journeys. Again, reference ought to be made to the guidance in COPECAT.</p>	<p>As the COPECAT audit system is an internal system, it is not considered appropriate to include a reference to it in the SPD.</p> <p>A section on facilities for pedestrians has now been incorporated into the document as suggested.</p>

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<p>Chapter 6- Minimising Energy Consumption and Chapter 7 – Maximising the provision of on site renewable energy supply.</p>	<p>Internal Consultee Alex McDyre (Spatial Planning) Salford City Council</p>	<p>Observation</p>	<p>I note that the final version of the Government's Planning Policy Statement 1 - Supplement on Planning and Climate change has now been published. Sections 6 and 7 of the draft SPD will need to be considered carefully in the light of the PPS1. There are requirements to assess the potential of all development sites for decentralised / renewable energy / low carbon energy and for targets to be set for developments. This is a move away from the blanket targets in the draft SPD. We have not had time to consider this in detail but an initial scanning of the PPS suggest there are some fundamental points we need to take account of in the SPD. I note that it is intended to merge Chapter 6: Minimising Energy Consumption and Chapter 7: Renewable Energy into one chapter. I can see the benefit of this approach because a developer would need both energy efficiency measures and renewables in new development to meet the 25% increase in energy performance over the Building regs.</p> <p>I note that Countryside Properties raised the issue that for developments within the floodplain it is preferable for unrestricted discharge into rivers. Wording should be added to state that if developments are within floodplains the advice of the Environment Agency should be sought for surface water drainage requirements on new development.</p>	<p>Comments noted. Consideration has been given to the new PPS1- Planning and Climate Change and these sections of the SPD have been amended accordingly. It is agreed that sections 6 and 7 cover related topics however, they will not be merged as the current layout is considered to best reflect guidance in PPS1 supplement Planning and Climate Change.</p> <p>Wording to this effect has been incorporated into the document.</p>

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Chapter 6- Minimising Energy Consumption and Chapter 7 – Maximising the provision of on site renewable energy supply.	Internal Consultee Will Horsfall (Principal Planner- Climate Change) Salford City Council		Need to review sections 6 and 7 in the light of the final version of the PPS1 supplement. I also think the issue of how the requirements in the SPD relate to the various levels of Code for Sustainable Homes needs to be explained more clearly possibly through the inclusion of a table summarising CSH requirements in each chapter. As we discussed you will also be reflecting the key points from the newly released report on improving the carbon performance of commercial buildings.	Consideration has been given to the new PPS1- Planning and Climate Change and these sections of the SPD have been amended accordingly. The need to consider the Code for Sustainable Homes has been expanded. Key points from the newly released report on improving the carbon performance of commercial buildings have also been incorporated into the SPD.