

ADUR DISTRICT COUNCIL
SUSTAINABLE ENERGY SPD
STATEMENT OF CONSULTATION

Introduction

Supplementary Planning Documents (SPDs) provide greater detail on policies within development plans. They are material considerations in planning decisions, but are not part of the development plan. While they are not examined by an Inspector, they are subject to a process of consultation and engagement with relevant parties. Once adopted, they form material considerations when relevant planning applications are considered.

What the SPD does

The Sustainable Energy Supplementary Planning Document (SPD) is intended to provide guidance to developers on meeting the energy policies set out in the adopted Adur Local Plan 2017 (Adur LP) and the emerging Joint Area Action Plan (JAAP) for Shoreham Harbour. It should be noted that the SPD does not set new policy; it advises how policy requirements in these plans can be met.

Consultation Summary

In preparing SPDs, the Council is required to comply with the relevant regulations as set out in Town and County Planning (Local Development) (England) Regulations 2004 (and 2012 amendments). These regulations require the Council to prepare and publish a statement setting out:

- Who was invited to be involved in the plan preparation
- How they were invited to be involved in the plan preparation
- A summary of the main issues raised and how they have been addressed

This statement addresses these points and has also been prepared in accordance with the Adur and Worthing Statement of Community Involvement (SCI) 2012.

During preparation of the Draft SPD, consultation was undertaken internally within the Council with key officers including the Development Management Team. A report was then taken to Adur Planning Committee on 11th March 2019 and a subsequent report to Executive Member for Regeneration (decision made 29th March 2019) which agreed the content of the SPD, and consultation period.

In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council then published the Draft SPD for consultation from 8th April – 31st May 2019.

The following consultation methods were used:

- A letter was sent to all those on the Adur Planning Policy consultation database . This comprises over 500 individuals, businesses and organisations, and includes statutory consultees and specific consultation bodies. Also 42 individuals, businesses and organisations on the Shoreham Harbour Regeneration database were contacted. (The letter is reproduced in Appendix A of this document).
- Local sustainability experts and consultants were also made aware of the consultation.
- The Draft SPD was published on the Council's website throughout this period (and beyond).
- Copies of the document were made available at the Council's offices at the Shoreham Centre, Shoreham-by-Sea; Portland House, Worthing; and at all three libraries in Adur (Shoreham, Lancing, and Southwick).
- The document and consultation were advertised on the Council's social media pages.

Response to Consultation

11 representations were received in total. These are set out in Appendix B of this document, together with officers' responses and, where relevant, changes proposed to the text of the SPD.

Appendix A: Consultation letter

Consultation: Draft Supplementary Planning Document for Adur: Sustainable Energy

I am writing to inform you that public consultation will start shortly on a new Draft Supplementary Planning Document for Adur, 'Sustainable Energy'.

A key aim of the adopted Adur Local Plan (2017) is to make progress towards a low carbon, sustainable community through sustainable construction, energy efficiency, the use of renewable energy, and to make a significant contribution to low and zero carbon energy production.

The draft SPD aims to clarify existing policy in Adur Local Plan and emerging policy in the Shoreham Harbour Joint Area Action Plan (JAAP). It presents clear guidance on how applicants can comply with policy and submit information to Adur District Council in a way which can easily be assessed by planning officers.

The draft SPD describes the various different renewable energy technologies and how they can be applied to developments. It clarifies the different energy requirements for the different plan areas in Adur (the Shoreham Harbour JAAP area and the remaining area in Adur). It also describes how an energy statement can be developed and what this should cover.

The draft Sustainable Energy SPD will apply to:

- new major residential and non-residential developments proposed in the Adur Local Plan area;
- new development in the Shoreham Harbour Regeneration Area (excluding householder applications);
- new development in the proposed Shoreham Heat Network Area (excluding householder applications).

However, this draft SPD encourages all developments to submit energy statements to demonstrate how they are delivering clean, smart sustainable, development, in the spirit of the wider sustainability objectives of the Plans.

The draft SPD will be made available for consultation for a period of 8 weeks, from Monday 8th April 2019 - 5pm Friday 17th May 2019. During this period, the draft SPD can be viewed here:

<https://www.adur-worthing.gov.uk/adur-ldf/spd-and-guidance/>

Paper copies of the document will also be available for inspection at the Adur and Worthing Councils' Offices at Portland House, Worthing, The Shoreham Centre and libraries in Adur.

Comments must be made in writing.

Please email to: adurplanningpolicy@adur-worthing.gov.uk

Or write to: Adur District Council, Planning Policy Team, Portland House, 44, Richmond Rd,
Worthing, BN11 1HS

Data Collection - What we collect and how it is used

The Council will process comments in accordance with the Data Protection Act 2018 and the General Data Protection Regulation 2016/679. We collect names, addresses and other contact details. However, when publishing the representations received during a consultation we will only publish the name of the individual respondent or the organisation that they represent. All other personal information will be omitted or redacted - this includes the contact details and signatures of individuals.

For further information, please refer to the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

End.

Appendix B: Full representations and responses:

REPRESENTATIONS ON DRAFT SUSTAINABLE ENERGY SPD

Rep No.	Organisation	Comments	Officer response (Proposed Changes to SPD in bold)
1	Highways England	<p>Thank you for your email of 5 April 2019 notifying Highways England of the public consultation on the Draft Supplementary Planning Document for Adur on Sustainable Energy.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network. The strategic road network is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England does not wish to comment on the draft SPD.</p>	<p><i>Comments noted. No changes required.</i></p>
2	West Sussex County Council	<p>This note sets out comments upon the Sustainable Energy SPD, setting out the intentions of Policies 8 and 19 of the Adur Local Plan and Policy SH1 of the Shoreham Harbour Joint Area Action Plan. West Sussex County Council supports the preparation of the SPD, promoting the importance of sustainable energy.</p> <p>This is an officer level response from West Sussex County Council, that Adur District Council are requested to give due consideration in the preparation of the SPD.</p> <p>Sections 1 and 2:</p> <p>It is considered that Parts 1.12 – 1.19 could refer to the energy hierarchy, as in Principle 1C.</p> <p>The energy hierarchy could be included in Section 2. This focuses on what is renewable energy and decentralised energy, without the context of the energy hierarchy. It is suggested that these sections could each be reordered, to align with the order of the energy hierarchy in Principle 1C.</p> <p>Principle 3: Use less energy (be lean):</p>	<p><i>Support noted and support welcomed.</i></p> <p><i>Paragraphs 1.12 and 1.13 modified as below:</i></p> <p>1.12 This supplementary planning document provides further detail on how to prepare an Energy Statement to accompany planning applications for major development. The purpose of an Energy Statement is to demonstrate that climate change mitigation measures comply with Policy 19 of the Adur Local Plan. <u>The Energy Statement enables developers to demonstrate the proposal's contribution to reducing carbon dioxide emissions in accordance with the following energy hierarchy:</u></p> <ol style="list-style-type: none"> <u>1. Be lean: use less energy</u> <u>2. Be clean: supply energy efficiently</u> <u>3. Be green: use renewable energy.</u> <p>1.13 <u>The Energy Statement</u> it also ensures sustainable energy is an integral part of the</p>

	<p>In minimum standards of this principle it includes the following:</p> <p>“D. Development proposals are strongly encouraged to achieve a minimum 19% reduction in CO2 emissions in dwellings over Part L Building Regulations requirements (2013 or subsequent update) solely from energy efficiency measures.”</p> <p>Part L Building Requirements have not been updated since 2013. They also are only designed to set a minimum standard.</p> <p>West Sussex County Council suggest stronger wording could be considered to encourage more than the minimum 19% reduction in CO2 emissions, particularly considering the UK100 Cities target of 100% clean energy by 2050. This could include the benefits of further reductions and also opportunities to comply with the Local Plan policies. For example, the SPD could assist further by showing how to achieve further BREEAM credits in line with Policy 18 of the Adur Local plan 2017 and SH1 of the JAAP.</p> <p>Principle 6: Alternative Solutions:</p> <p>Where the targets can't be met on site, there is an opportunity for the Council to secure a financial contribution through a S106 legal agreement. In these instances the level of contribution could be calculated on a site by site basis to reflect the characteristics of the proposed development and the level of mitigation required. By using the approach to calculating 10% renewable energy provision as set out within this SPD, through the Energy Statement, the developer could be required to provide costed evidence to the Council to be used as the basis of any requirements for a financial contribution.</p> <p>Owing to the above, the following planning condition similar to that shown below could be considered in order to secure S106 contributions:</p> <p>"At least 10% of the energy supply of the development shall be secured from renewable or low-carbon energy sources Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the Local Planning Authority [as a part of the reserved matters submissions required by condition x] prior to the commencement of the development. The approved details shall be implemented in accordance with the approved timetable prior to the commencement of the development and retained as operational thereafter or the use of the building, unless otherwise agreed in writing by the Local Planning Authority."</p>	<p>development's design and evolution. Smaller developments are also encouraged to meet the standard and submit an Energy Statement.</p> <p><i>Section 2 has been reordered to follow steps 2 and 3 of the energy hierarchy.</i></p> <p><i>Principle 3 strongly encourages a minimum 19% reduction in CO₂ emissions over Part L Building Regulations from energy efficiency measures. It would be very challenging to achieve a higher standard from energy efficiency alone, and beyond the scope of an SPD. An additional paragraph has been added to the Introduction, as below:</i></p> <p><u>The policies and principles referred to in this document are minimum standards. The Council will welcome proposals that exceed these standards. Given the Council's commitment to reducing carbon emissions, zero carbon development will be supported.</u></p> <p><i>Principle 1 has been amended as below:</i></p> <p>C. The Energy Statement should demonstrate the proposal's contribution to reducing carbon dioxide radically reducing greenhouse gas emissions in accordance with the following energy hierarchy:</p> <ol style="list-style-type: none"> 1. Be lean: use less energy 2. Be clean: supply energy efficiently 3. Be green: use renewable energy. <p><i>The approach suggested in comments on Principle 6 on financial contributions for alternative solutions will be explored in the next review of the Adur Local Plan.</i></p> <p><i>The suggested planning condition will be considered, where appropriate, when making planning decisions.</i></p>
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3	Natural England	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment:</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	<p><i>Comments noted. No changes required. Both the Adur Local Plan and Shoreham Harbour Joint Area Action Plan have been subject to Strategic Environmental Assessment, and screened for Habitats Regulations Assessment.</i></p>
4	Historic England	<p>As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.</p> <p>Historic England’s notes the reference in the document to heritage, viz. Principle 10: Historic buildings and conservation areas. We do not consider this in its self to be sufficient advice to potential developers and householders considering retrofitting energy efficiency measures to their properties and may lead to unlawful and prosecutable actions, for example physical changes to a listed building that harms its significance; this should be made more explicit.</p> <p>It would be useful to signpost advice on making appropriate energy efficiency changes to historic buildings on the Historic England website: https://historicengland.org.uk/advice/yourhome/saving-en.ergy/ A householder guidance document is also downloadable from the website: https://historicengland.org.uk/images-books/publications/eehb-how-to-improveenergy-efficiency and may be included in the Sources of Further Information section of the SPD.</p> <p>Historic England would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best</p>	<p><i>Comments noted. The suggested guidance documents have been provided as links in the Further Information section in Appendix 3.</i></p>

		<p>placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185).</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment</p>	
5	Maria Hawton-Meade	<p>I feel that your policy should go further than the proposed carbon reduction with a trajectory to zero carbon by 2050. The proposed reduction will not push forward the reduction in carbon that is needed to address our climate emergency.</p> <p>I would encourage an overheating checklist to be included such as the checklist in appendix 5 of GLA energy assessment guide 2018 – I feel that SAP and BREEAM do not cover overheating to prevent overheating - and all applicants should complete an overheating analysis for each building using dynamic thermal modelling in line with guidance set out in CIBSE TM52 and TM49 respectively.</p> <p>I recommend that the BREEAM standard is qualified for shell only and fit out only e.g. The council will expect ‘as built’ reports for non-domestic developments to demonstrate compliance to Policy BREEAM standards for BREEAM UK new construction ‘shell only’ for shell only and BREEAM UK refurbishment and fit- out schemes for ‘shell and core’ for fit-out only.</p>	<p><i>Regarding zero carbon development, an additional paragraph has been added to the Introduction, as below:</i></p> <p><u>The policies and principles referred to in this document are minimum standards. The Council will welcome proposals that exceed these standards. Given the Council’s commitment to reducing carbon emissions, zero carbon development will be supported.</u></p> <p><i>The suggested trajectory to zero carbon by 2050 will be considered in the next review of the Adur Local Plan.</i></p> <p><i>Regarding overheating, an additional clause has been added to Principle 3, as below:</i></p> <p><u>Development proposals are also expected to take steps to avoid overheating in buildings once in use. It is recommended that the Greater London Authority’s Domestic Overheating Checklist be used at the design stage.</u></p> <p><i>A footnote has been added with a link to the checklist.</i></p> <p><i>Regarding BREEAM standards, an addition has been</i></p>

			<p><i>made to Clause C of Principle 3, as below:</i></p> <p><u>For speculative buildings where user and fit-out details are unknown, 'shell only' or 'shell and core' BREEAM assessments should be pursued, and the applicable minimum standards will still apply.</u></p>
6	Andrew Bradbury	<p>I broadly welcome the Draft Supplementary Planning Document April 2019 as a guide to developers and recognise that in terms of establishment of a framework of energy efficiency assessment within a broader planning regime it is fundamentally a significant step forwards. My observations are in the areas of expected likelihood of the bite of the proposals with developers and, more significantly, with the implications of the framework both in its release and implementation for the overarching need for Adur (and Adur & Worthing) to become carbon neutral by 2030.</p> <ol style="list-style-type: none"> 1. The Guidance only 'encourages' all developments outside of the main remit to submit Energy Statements. It is implicit in this that all developments could do so and also that some or many will choose not to. This is inadequate, and Adur should show leadership in requiring all developments to submit Energy Statements which become matters of public record in a similar manner to planning applications. 2. The pace and ambition of the proposals is too slow and too low. The Climate Change Act 2008 has the expected impact only of a 57% reduction in carbon emissions by 2030 and SustainableAW itself aligns with UK 100 Cities which aims for 100% clean energy only by 2050. It is now beyond doubt that the impending planetary catastrophe requires much more urgent action and indeed achievement of a reduction of 100% of carbon emissions (net zero carbon) by 2030. For example, I refer to the increasingly forceful statements of the Intergovernmental Panel on Climate Change, most recently echoed in the UK by The Lancet (20/02/2019) which calls on the UK Government to legislate to be carbon neutral by 2030. 3. The UK Clean Growth Strategy 2017 whilst sitting outside of a 2030 target, does recognise that Local Authorities can play an important role in improving the energy performance of buildings and more widely in this area. It should not therefore be seen as sufficient for Adur (and Adur & Worthing) to itself await tighter controls from the UK Government when the Government itself considers that Adur could be leading the way with its partners, residents and other Local Authorities. 	<p><i>Comments noted and support welcomed.</i></p> <p><i>Regarding Points 1-3, this SPD cannot create new policy going beyond the adopted policy in ALP and JAAP. However, these approaches will be considered when those plans are next reviewed.</i></p> <p><i>Regarding Point 4, support for the project is welcomed. Progress will be reported to Councillors. However, this is outside the scope of this SPD.</i></p> <p><i>Regarding Point 5, training will be provided to Development Management and Major Projects Teams within the Planning Authority. Monitoring will be undertaken for the Annual Monitoring Review and published on the council website.</i></p>

		<p>4. I am encouraged by the innovative thinking and collaborative nature of the proposals for a Shoreham Heat Network Area. I also applaud the requirement that heating and cooling systems within the footprint of the scheme must be compatible with future connection to a network. What I would like to see are milestones for the implementation of the scheme and a requirement to report back to Councillors at set dates and as a minimum at twelve months intervals for the next three years.</p> <p>5. The Guidance is relatively silent on interrogation of Energy Statements once submitted. I would like to see a compliance regime within Adur Planning which includes accountability to the public for continuous improvement against the benchmarks of an ambitious energy efficiency scheme.</p> <p>Thank you for giving me the opportunity to contribute on these vitally important issues.</p>	
7	Environment Agency	<p>Overall we support the principle of this Supplementary Planning Document and its importance in contributing to climate change mitigation and adaptation.</p> <p>With regard to issues in our remit we are disappointed that the opportunity was not taken to extend the scope of the document to include additional information in support of developments achieving the higher standards of water efficiency as set out in ALP Policy 18: Sustainable Design and JAAP Policy SH1: Climate change, energy and sustainable building.</p> <p>We note that Appendix 2 identifies information to be submitted with any planning application and that the Environment Agency are specifically referred to with regard to Water/Ground Source heat pump technology. Please note that this will be in regard to groundwater protection. It should also be noted that other energy technologies may also trigger consultation with the Environment Agency depending on their scale and location. This will be in line with the Development Management Procedure Order 2015 and our own external consultation checklist.</p>	<p><i>Comments welcomed and support noted.</i></p> <p><i>The scope of this SPD is solely on sustainable energy. The higher water efficiency standards are already adopted in both the Adur Local Plan and the Joint Area Action Plan.</i></p> <p><i>Regarding the comments on consultation with the Environment Agency, the relevant section of Appendix 2 has been modified, as below:</i></p> <p>Evidence of consultation with appropriate bodies such as the EA, as regards potential soil-contamination groundwater protection, and Natural England as regards potential ecological issues.</p>
8	Dominic Furlong	<p>I welcome the preparation of a Supplementary Planning Document on Sustainable Energy. However, I am concerned that the principles in the SPD will lack sufficient weight to be fully enforced. In order to ensure that all new development complies with the energy hierarchy, a review of Policies 18 and 19 of the Adur Local Plan should be carried out as soon as possible.</p> <p>The SPD refers to the National Planning Policy Framework (2018). The NPPF was</p>	<p><i>Comments noted and support welcomed.</i></p> <p><i>Regarding comments on applying energy statement requirement being applied to all developments, this SPD cannot create new policy going beyond the adopted policy in Adur Local Plan and the Joint Area Action Plan. However, a more ambitious approach will</i></p>

	<p>updated in 2019, so references to this should be amended.</p> <p>The NPPF requires that local authorities to include policies to deliver radical reductions in greenhouse gas emissions and support renewable and low carbon energy. Policy 19 of the Adur Local Plan clearly aspires to do so. However, it lacks the clarity to ensure that this is the case. The 10% onsite renewable energy generation can be interpreted as falling within compliance with building regulations, rather than an additional requirement. The SPD states that the renewable energy proportion should be calculated after building fabric efficiency improvements and efficient supply through heat networks. However, a revised local plan policy would carry greater weight.</p> <p>The last few years have been somewhat confusing in terms of national policy on energy efficiency. The removal of the Code for Sustainable Homes left a somewhat ambiguous situation with regard to the ability of local authorities to require more stringent fabric energy efficiency standards than those set out in building regulations. The clarification from government in response to consultation on the NPPF that authorities may continue to require a 19% improvement on 2013 standards should be regarded as a material change in circumstances and therefore trigger a single issue policy review in advance of the full plan review. This standard was adopted as policy in Brighton & Hove City Plan Part One.</p> <p>I welcome the reference to the SAP 10 grid carbon emissions factor in paragraph 5.7. However, it is not sufficient to encourage development to use this. The SAP 2012 grid carbon emissions factor is extremely out-of-date. Even SAP 10 is considerably higher than the current grid carbon emissions factor. BEIS has published grid carbon projections up to 2035. Given the likely lifespan of buildings constructed now, it would be more appropriate to use this figure (41g CO₂/kWh). Even if it is not possible to use this as the basis for decision making, developers could be required to model this, so that the long term impact of heating systems selected can be seen. This will have the effect of discouraging gas heating systems, which would accord with the treasury announcement to phase out new gas grid connections by 2025.</p> <p>The 10% target for onsite renewable energy generation is welcomed. A more ambitious target would be at least 20%, as currently being pursued by Milton Keynes Council. Overall, the SPD is a positive step, and is supported. The council must ensure that the principles within it are rigorously applied. The most effective way to do so would be to review the relevant policies in the local plan.</p>	<p><i>be considered when the plans are next reviewed.</i></p> <p><i>Regarding comments on the NPPF, references to the 2018 version have been updated to 2019.</i></p> <p><i>Regarding comments on radical reductions in greenhouse gas emissions and the weight of the local plan policy, and setting more ambitious renewable energy targets, the suggested approaches will be considered when the local plans are reviewed.</i></p>
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9	Damian Tow (Brighton Energy Co-op)	As one of the directors of Brighton Energy Co-op who have installed 585kwp of PV at Shoreham Port we are supportive of whatever planning policy tools you can use to encourage more local renewable energy generation and energy efficiency projects. We are about to trial linking PV arrays to EV charge points so would also encourage mandated installation of far more chargepoints than presently exist.	<i>Comments noted. No changes required.</i>
10	Lancing Parish Council	At the Council meeting last week, Members agreed to support the Draft Supplementary Planning document for Adur: Sustainable Energy in its current form.	<i>Comments noted. No changes required.</i>
11	East Worthing and Shoreham Constituency Labour Party	<p>The East Worthing and Shoreham CLP Environment and Transport Forum welcomes the opportunity to contribute to the public consultation on this SPD and to provide comments that we believe add value to the aspiration to maximise the development and use of energy generated by sustainable technologies on the District.</p> <p>Climate change is a catastrophic process that threatens the future of our planet. Limiting the emissions of gases associated with climate change is of pressing urgency and steps taken locally have the potential to make a significant contribution to reducing the risks associated with the worst- case scenarios of global temperature rise.</p> <p>Criteria for assessment of SPD</p> <p>We have sought to assess the draft SPD against the principles set out in the Adur Local Plan, as summarised in the final paragraph on page 1 of the document itself, and guidance in paragraphs 148 and 151 of the National Planning Policy Framework.</p> <p>General comments</p> <p>In addition to the guidance provided in the SPD to developers of specific projects, the Council should play a strategic role in liaising with the providers of large-scale sustainable energy developments in order to seek to match the supply and demand of energy generated from carbon neutral technologies.</p> <p>In essence, the Council needs to both work with energy companies to ensure the provision of an adequate ‘pool’ of sustainable energy availability to meet the needs of future developments, and help developers to tap into low carbon energy sources. Otherwise there is a danger of setting developers up to fail. Development of a strategic approach in the District to the use of battery storage of sustainably-generated energy is also required and should be referenced in the SPD. Such facilities, provided they are</p>	<p><i>Regarding comments on battery storage, the Introduction has been modified as below:</i></p> <p>Adur District Council is committed to increasing renewable and low carbon decentralised energy, including large scale battery storage through the Adur Local Plan and Shoreham Harbour Joint Area Action Plan. The Council has committed to the UK100 Cities target of 100% clean energy by 2050. The requirement for renewable and low carbon energy in proposed development is aligned with the National Planning Policy Framework which requires all local planning authorities to deliver radical reductions in greenhouse gas emissions and support renewable and low carbon energy.</p> <p><i>Information on battery storage has been added to Section 2.</i></p> <p><i>Regarding Point 1, this SPD cannot create new policy going beyond the adopted policy in Adur Local Plan and the Joint Area Action Plan. However, a more ambitious approach will be considered when the DPDs are next reviewed.</i></p> <p><i>Regarding Points 2-4, these suggestions are beyond the remit of an SPD.</i></p> <p><i>Regarding Point 5 there are no proposed sites for</i></p>

	<p>appropriately located, could have a significant role to play in offsetting otherwise financially unviable renewable energy schemes.</p> <p>Specific comments</p> <p>Taken as a whole we welcome the approach adopted in the draft SPD and believe that, overall, the document is compliant with the national and local policy context. We would like to make the following specific observations:</p> <ol style="list-style-type: none">1. We note the distinction made between ‘major’ and other developments, except in the Shoreham Harbour Regeneration Area. Whilst it is accepted that the definition of ‘major development’ derives from statutory provisions, we nevertheless believe that all developments, including those of fewer than 10 dwelling houses (with the exception of owner-led developments associated with the curtilage of existing dwellings) should be required rather than merely encouraged to provide an Energy Statement.2. We consider that there is a major role to be played in sustainable energy delivery through the development of publicly-owned properties and housing owned or managed by housing associations and similar bodies, and that therefore all new public and housing association developments (whether for residential or non-residential use) should be required to achieve BREEAM ‘Very Good’ standards or equivalent (cf Adur Local Plan Policy 18). We support the statement in JAAP Policy SH1 paragraph 3 requiring all new commercial buildings within the JAAP to meet the BREEAM ‘excellent standard’.3. More specifically there should be an explicit statement in the SPD that consideration will be given to the installation of sustainable energy generation in all new and existing Council properties, and that an Energy Statement should be produced for all such properties.4. The SPD places an emphasis on the role of solar energy in meeting its objectives, and clearly this is very important, but in view of the likely implications of an increase in VAT liability upon this sector it is important to ensure that low carbon outcomes are not prejudiced as a result. The SPD should set out proposals for a means by which the Council will offset or mitigate such negative consequences stemming from VAT increases.	<p><i>hydraulic fracturing within the Adur Local Plan area. It is not possible to distinguish whether grid energy is derived from this source.</i></p>
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