

Annex D

Consultation Form

Technical Advice Note 22 - Planning for Sustainable Buildings (Consultation)	
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Type	Professional Bodies/Interest Groups

The Welsh Assembly Government intends to publish a summary of the responses to this document. Normally, the name and address (or part of the address) of its author are published along with the response, as this gives credibility to the consultation exercise. If you do not wish to be identified as the author of your response, please state this expressly in writing to us.

Q1	p.10	Does this provide sufficient introduction and explanation on Sustainable Building Standards?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Comments</i>				
<p>This provides a good overview of the standards. But perhaps more signposting and context (in Section 1.2) could be provided particularly as the Climate Change Agenda is expanding. In particular 'The Low Carbon Transition Plan' which is a consequence of the Climate Change Act 2008 provides the updated context. Given the rapid evolution of Legislation and policy the tone does not convey the imperative represented by climate change.</p> <p>On page 8, there is a footnote to say "Or equivalent quality assured scheme" - does this need to be clarified e.g. approved by CLG; is there a possibility that an unacceptable scheme / approach could be introduced? The CLG role in approving the Code for Sustainable Homes should be highlighted. In this context the indication given in the UK Low Carbon Transition Plan page 79 - amplified by the UK Zero Carbon Hub should be referred to.</p> <p>There should also be a section explaining that accredited assessors are required to complete the assessments.</p> <p>2..4.1 should point out that developers should be aware that changes made during the construction phase could affect the Post Construction stage.</p> <p>The last line of 2.4.1 should be in bold print.</p> <p>Is there a typing error in the final sentence of para 2.5.1?</p>				

Q2	Does this fully explain the carbon emission requirements	Yes	No

	expected under the Sustainable Building Standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Comments</i>			
This does explain the requirements. It would be usefull to provide signposting to examples of how to achieve this. It is also imperative that it is stated that the siting and positioning of any buildings can help achieve the energy hierarchy and that it is not just about insulation and low and zero carbon technologies.			

Q3	p. 14/15	Do you consider the approach to considering the energy hierarchy through the 'Design and Access Statement' appropriate as a way of demonstrating how carbon emissions have been reduced?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Comments</i>				
The Design and Access Statement is an appropriate mechanism. However the level of detail required for an outline planning application should be made clear; there should be some guidance which gives an indication of the proprtionalty of the detail required to advise both developers and LPAs.				

Q4	p. 15	Do you consider it appropriate to set out the technical constraints that may be considered in incorporating Low and Zero Carbon Energy technologies in this TAN?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Comments</i>				
However, the emphasis must be on the fact that this is in exceptional circumstances.				

Q5	p.16	Do you consider that the approach to policy constraints is appropriate?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Comments</i>				
It would be benefical to provide guidance / examples of good practice on how Listed Buildings or Conservation Areas etc can incorporate sustainable buidling standards. The National Trust is doing some experimental work on this and RTPI Cymru will be working with the Trust to hold an event to demonstrate some of these.				
4.1.1 should also highlight the need to comply with local policies.				

Q6	p.26	Does the 'Policy Implementation Map' provide the appropriate level of detail and clarity needed to aid implementation of the policy?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

The Policy Implementation Map is a useful and clear tool.

It would be helpful to also highlight LDP policies in the pre-application stage.

There is a need to emphasis that this policy area is just one aspect of sustainable development and that LPAs will also be taking into account other issues such as transport / access and location issues, flooding etc.

There is no mention of enforcement in the guidance and this will need to be dealt with, to ensure that the policy is implemented.

There is potentially a considerable amount of burden on LPAs. There should be details about who else can assist.

Q7	p.27	Do you consider that the example planning conditions are appropriate?	Yes	No
			<input type="checkbox"/>	<input type="checkbox"/>

Comments

The Conditions should be tested against the six tests to verify that they are fit for purpose. The enforcement of these conditions will be essential.

Q8	p.28	Do you agree that the proposed approach to exceptions is appropriate?	Yes	No
			<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments

Q9	p.30	Does this section provide sufficient clarity on the expectations of local planning authorities when developing policies for their LDP?	Yes	No
			<input type="checkbox"/>	<input type="checkbox"/>

Comments

8.1.3 makes it ambiguous as to whether LDPs or SPG should be based on the justification for higher standards.

8.1.5 should included an additional bullet: "the requirement would not lead to poor design."

Q10

P.30

Do you have any views on how the national sustainable building standards national planning policy could be monitored and reviewed?

Comments

This should be done by LPAs in their LDP annual monitoring report. In advance of completing their LDP, LPAs would need to submit figures separately or with other returns required by the Welsh Assembly Government.

Q11

P.32

Do you have any further references, signposts or case studies that could be included in this section?

Comments

A definition of development would be helpful; does it include refurbishment?

it would be useful to have a map comparing the sustainable building standard requirements with the Building Regulation requirements.