

Statement of Consultation
Climate Change Mitigation and Adaptation SPD
August 2025

Introduction

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 require a local planning authority to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.
- 1.2 This statement sets out information about the statutory consultation that has informed the preparation of the Climate Change Mitigation and Adaptation Supplementary Planning Document (SPD). The consultation ran from the 1st to the 31st of July 2024.
- 1.3 Included within this statement is a schedule of the comments received during the consultation, incorporating the main issues raised. The schedule also includes the Council's response to the comments and main issues, and how these have been addressed in the final version of the SPD including any changes made to the SPD. A schedule of these comments and the Council's response including the changes that were made to the SPD in response to the comments is on the following pages.
- 1.4 An initial consultation was held in the summer of 2023, after which many changes were made to the SPD. The Consultation Statement for that consultation, which gives a summary of the changes made in response to your comments, is attached to this document as Appendix 1.
- 1.5 Letters and e-mails were sent out to residents and organisations on the Council's consultee database, neighbouring authorities and statutory consultees. Printed copies of the document were available to view at the Council offices at Hounslow House, and libraries within the Borough. The document was also available to view online at <https://talk.hounslow.gov.uk/climate-change-supplementary-planning-document-consultation>. In addition, the consultation was advertised on the Council's website and social media channels.

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Mike P	Agree	<p>No - please specify why not - I welcome that the consultation document states that upcoming Householder Retrofit guidance will include bird & bat nest/ roost sites (as per national and London Plan guidance), but two other aspects of my earlier comments were overlooked without a reason given: Please consider the impact on building-dependent biodiversity such as bats and red-listed birds such as swifts and house sparrows during energy efficient retrofit. Nest sites should be retained where possible, and mitigation provided where not. Major refurbishments: Install swift bricks and integrated bat boxes for building-dependent biodiversity, which have benefits for wildlife but are not included in the biodiversity net gain calculation.</p> <p>My suggested amendments are in accordance with the National Model Design Code guidance (Habitats sections, pages 25 & 26), London Plan G6 B4, and NPPG Natural Environment 2019 paragraph 023.</p>	Yes	<p>This SPD scope is limited to climate change mitigation (i.e. carbon reduction) and adaptation (to climatic changes).</p> <p>The points raised are out of scope of this SPD, but are in scope of, and have been included in, the companion Character, Sustainability, Design Codes SPD - see paragraph A2.155 "Incorporate infrastructure into development to support wildlife, such as swift bricks, bat bricks, bird-boxes and hedgehog holes in garden fences. Also paragraph A2.166</p> <p>For retrofit of existing buildings - the council has published separate guidance on improving sustainability of existing homes and other small buildings, in which your points have also been covered - see https://www.hounslow.gov.uk/info/20006/environment/2592/improving_the_sustainability_of_your_home/6</p> <p>Changes to SPD None</p>

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		<p>Swift bricks are a universal nest brick for small bird species, e.g. NHBC Foundation report "Biodiversity in new housing developments: creating wildlife-friendly communities" (April 2021) states: "Provision of integral nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction [i.e. swift bricks]. Although targeting swifts they will also be used by house sparrows, tits and starlings so are considered a 'universal brick'" (section 8.1, page 42).</p>		
Woodlands Trust	Strongly agree	<p>Yes</p> <p>Strongly welcome the integration of nature-based solutions, Green & Blue infrastructure and tree planting. Trees and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems. They also make a valuable contribution to the quality of</p>	Yes	<p>Support welcomed.</p> <p>Changes to SPD None</p>

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		the public realm, helping reduce air, noise and light pollution and improve people's mental health.		
Hounslow Borough Friends of the Earth	<p>1. Concern that, because local people are more interested in local plan rather technical advice in SPD, responses will be skewed towards developers, often trying to circumvent environmental obligations. This asymmetry needs to be recognised when looking at the responses.</p> <p>2. We take climate change very seriously and support the opening statement about its enormous significance. In the</p>	<p>3. We are concerned about the availability of carbon offsets in the case of 'justifiable shortfall'. As referenced the price of carbon is too low and offsetting is recognised as very problematic and often ineffective and a sham. We would like to see very strict control around this and refusal of permission rather than payment of a 'fine' which developers are well able to afford.</p> <p>4. In accordance with 'polluter pays' a charge should be made on all carbon emitted in a building life cycle, not just that above a nominal threshold.</p> <p>5. Operational emissions need to be monitored and matched against estimates, as with other planning conditions, with a penalty if breached</p>		<p>All responses to consultation are taken seriously. During the consultation on the first draft, extensive efforts were made to gather feedback from local residents and groups, which have been taken into consideration in the preparation of this draft.</p> <p>The council's policy in relation to cost of carbon and offset charges must be compliant with national planning regulations and the development plan (including the London Plan). Within this context, the council is seeking to increase the cost of carbon in the next iteration of the Local Plan, as this has been signposted in this SPD. The intention is that this results in greater carbon reduction action rather than the payment of offset costs.</p> <p>This SPD reiterates the London Plan Policy SI 2 requirement for developers and owners of all new major developments to monitor and report actual operational energy performance for at least five years post-occupancy through the 'Be Seen' portal, as set out in the GLA's Be Seen – Energy Monitoring Guidance.</p> <p>Changes to SPD None</p>

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	<p>light of this we would like to see radical action by the Council in its relationships with developers</p> <p>6. We can't make detailed comment on the effectiveness of the SPD as we are not seeing clear estimates of the effects on emissions of the policies.</p>			

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Port of London Authority (PLA)		Further to our initial comments on the first draft of this SPD, we would reiterate the role of the tidal Thames in promoting sustainable transport in the SPD in order to help deliver a greener borough which is more resilient to climate change, with particular reference to the use of the river through the supply chain for the transportation of construction and waste materials. This would be in accordance with policy SI15 (Water Transport) of the London Plan (2021) which recognises water transport as one of the most sustainable modes for freight, particularly for low-value, non-time-critical bulk movements to help reduce the number of lorry movements on London's roads and their associated negative impacts.		<p>Thanks for your response. We have included a more explicit reference to the role of the tidal Thames in promoting sustainable transport in SPD section 3.3.4</p> <p>Changes to SPD</p> <p>SPD section 3.3.4, final paragraph: expand reference to sustainable transport, as follows:</p> <p>"All schemes that can demonstrate positive steps have been taken to reduce embodied carbon should do so, as this will weigh positively in the overall planning balance of the scheme. <u>Applicants are encouraged to include in their approach, implementation of circular economy principles, use of the river and other waterways for transportation of construction and waste materials, and other sustainable construction and transportation practices.</u> Further guidance....."</p>
Transport for London		Transport for London (TfL) has no comments on the updated SPD on		Comments noted

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		Climate Change Mitigation and Adaptation.		Changes to SPD None
Surrey County Council		Please note that we have no comments to raise		Comments noted Changes to SPD None
Natural England		No comments on Climate Change Mitigation and Adaptation Supplementary Planning Document		Comments noted Changes to SPD None
Environment Agency		<p>We welcome the London Borough of Hounslow's identification of climate change as a priority, underpinned by a vision for reducing the carbon emissions of the built environment, achieving net-zero and adapting to the changing climate.</p> <p>We are also pleased to see that many of our comments from our response to the draft SPD (dated 25 July 2023) have been taken on board, specifically our comments related to:</p>	No comment	<p>Thanks for comprehensive response. We are grateful for your acknowledgement of changes we have made to the SPD.</p> <p>We consider that the points you have made in relation to water and sewerage infrastructure and the Thames Estuary 2100 Plan are already being dealt with through the Local Plan and other existing policies.</p> <p>In relation to specific suggestions you have made for this SPD: • SuDs longer term maintenance, where different types of SuDS will and will not be appropriate: SuDS are already covered in more detail in the Character, Sustainability and Design Codes SPD</p>

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		<ul style="list-style-type: none"> • Flood risk • Water resources • Green and blue infrastructure <p>Flood risk We want to ensure that resilience to climate change is embedded in new development, so that today's places and infrastructure are resilient to tomorrow's climate. Specific policies and outcomes we wish to see include considering reasonable worst-case scenarios when considering locations for new development, steering development to areas with the lowest risk of flooding and maximising opportunities for development design to reduce the impacts of flood risk.</p> <p>We are therefore pleased to see this SPD has included our previous recommendations, specifically:</p> <ul style="list-style-type: none"> • In Chapter 2 'Stage 2: Development Layout & form' (page 17) we are pleased to see that an issue for consideration is that new development site layouts minimise current and 		<ul style="list-style-type: none"> • Nature-based solutions (NbS) to build resilience to climate impacts: already covered in more detail in the Character, Sustainability and Design Codes SPD • Chapter 2 'Stage 2: Development Layout & form' (page 17) - new developments also consider how future flood management infrastructure could be incorporated – we have included a reference as suggested <p>Changes to SPD Chapter 2 'Stage 2: Development Layout & form' (page 17): Page 17 - row 4 of table (on flood risk); column two to include additional sentence below:</p> <p>Flood risk is kept to an acceptable level and minimised for the most at risk uses</p> <p><u>New developments also to consider how future flood management infrastructure could be incorporated</u></p>

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		<p>future flood risk and locate more vulnerable parts of development in the lowest risk parts of the site with a desired outcome that 'Flood risk is kept to an acceptable level and minimised for the most at risk uses'.</p> <ul style="list-style-type: none"> • In Chapter 3 'Towards Zero Carbon and Climate Adaptation' paragraph 3.6.3 (page 56) we are pleased to see that where building has been permitted in locations where there is a risk of flooding – whether now or in the future, recommendations are made that new developments incorporate: <ul style="list-style-type: none"> o 'Finished Floor Levels (FFLs) that are built to the appropriate levels, including climate change allowances' o 'Other flood resistance and resilience measures such as physical barriers, raised electrical fittings and special construction materials'. <p>We would suggest that:</p> <ul style="list-style-type: none"> • The longer term maintenance of SuDS and the associated carbon and climate change impacts are 		

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		<p>considered in new developments and would encourage policies which set out the locations of where different types of SuDS will and will not be appropriate, to maximise their benefits and minimise risks.</p> <ul style="list-style-type: none"> • In Chapter 2 'Stage 2: Development Layout & form' (page 17) new developments also consider how future flood management infrastructure could be incorporated. <p>We are satisfied that other feedback provided in our previous response (dated 25 July 2023), relating to the provision of buffer zones along watercourses is covered in Hounslow's current Local Plan (2015) and the Character, Sustainability and Design Codes SPD (2024).</p> <p>Water resources We are pleased to see that this SPD stresses the importance for new developments to not lead to an overall increase in demand for water and justifies this position using our</p>		

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		<p>evidence on the Thames Water region being classed as 'seriously water stressed'.</p> <p>We support increasing the water efficiency of developments which reduces water use and cuts carbon emissions and promote approaches that support the transition to a more Circular Economy.</p> <p>We are therefore pleased to see the following recommendations have been included for new developments in Chapter 3 'Towards Zero Carbon and Climate Adaptation' paragraph 3.6.2 (page 56):</p> <ul style="list-style-type: none"> • All developments will be required to demonstrate that the use of mains water is minimised by incorporating measures such as smart metering and recycling measures. • All major development and high water-use developments will be expected to include water-saving measures – such as low flush toilets, low flow taps and showers – and the 		

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		<p>limit set in the London Plan of 105 litres per person per day (l/p/d) for indoor water</p> <ul style="list-style-type: none"> o Applicants are strongly encouraged to go beyond this, to achieve the RIBA 2030 Climate Challenge target for residential buildings of <75 l/p/d use (plus 5 l/p/d for watering gardens) have been included. • All developments are strongly encouraged to incorporate rainwater collection and/or grey-water reuse. <p>Green and blue infrastructure In our previous response (dated 25 July 2023), we recommended that integrating green/blue infrastructure can help with tackling overheating and reduce the need for the cooling of buildings.</p> <p>We are pleased to see that this is included in Chapter 3 'Towards Zero Carbon and Climate Adaptation' – 'The Cooling Hierarchy'.</p>		

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		<p>We also recommended that green and blue infrastructure is integrated along transport corridors.</p> <p>We are pleased to see that this SPD highlights that green space design supports biodiversity, helps address overheating and flood risks and recommends that existing green and blue infrastructure is preserved and enhanced.</p> <p>We are satisfied that the importance of green and blue infrastructure is covered in Hounslow's current Local Plan (2015), the Character, Sustainability and Design Codes SPD (2024) and the Green and Blue Infrastructure Strategy (2021).</p> <p>Water - In regards to water, we wish to see early consideration of the water supply and sewerage infrastructure required to support climate resilient growth, for example through evidence/the commitment of water companies to ensure adequate supply,</p>		

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		<p>water efficiency and treatment, conveyance and environmental disposal capacity is planned for and available.</p> <p>Nature-based solutions (NbS) - As mentioned in our previous response, we strongly encourage the uptake of Nature-based solutions (NbS) to build resilience to climate impacts, such as flooding, drought and overheating, and to absorb and store greater quantities of carbon. This also supports commitments to achieving net zero carbon as NbS can provide natural carbon sinks and sequester carbon. New developments should be encouraged to include NbS as a requirement as they provide a key range of benefits in tackling climate change, including by protecting built assets e.g. they can help protect concrete flood defences by moderating stresses they are subject to and improve their climate</p>		

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		<p>resilience/longevity.</p> <p>Thames Estuary 2100 Plan - As mentioned in our previous response, we would be looking to see the incorporation of policies from the Thames Estuary 2100 Plan to manage the impacts of climate change on flood risk.</p> <p>Hounslow has two areas that are identified in the TE2100 plan as needing to 'take action to maintain flood defences at their current level, accepting that the flood risk will increase' and 'take further action to reduce the risk of flooding, including upgrading the defences to cope with future sea level rise'.</p> <p>The two areas are:</p> <ul style="list-style-type: none"> • Twickenham Policy Unit: Thames Estuary 2100 • Hammersmith Policy Unit: Thames Estuary 2100 <p>These areas have been identified as flood risk will increase in this area</p>		

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		<p>when the Environment Agency stops using the Thames Barrier to manage smaller fluvial floods (fluvial flood risk). This means there is an additional need/emphasis on working with developers and communities to ensure flood defences are raised, maintained and alternative measures are in place to manage flood risk, i.e., increased community resilience.</p> <p>There are a number of policies in Hounslow's existing and upcoming strategic planning documents which recognise applying TE2100 policies:</p> <ul style="list-style-type: none"> • Policy EQ3 Flood Risk & Surface Water Management in Hounslow's existing and draft local plan supports implementing TE2100 policies • Policy GB5 Blue Ribbon Network in Hounslow's existing and draft local plan supports implementing TE2100 policies 		
NHS Property Services Ltd		Chapter 3 Towards Zero Carbon and Climate Adaptation Section 3.5 Carbon Offsetting seeks		Thanks for your comments. We have noted your comment that NHS property could benefit from carbon offset funds, to support the NHS to reach the goal of becoming the world's first

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		<p>to set out a carbon offsetting option for developers if it can be demonstrated that it is not possible to achieve operational zero-carbon on-site, so that any residual emissions are subject to a carbon offset payment. NHSPS fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.</p> <p>NHSPS thank LB Hounslow Council for the opportunity to comment on</p>		<p>net zero healthcare provider, and your request to be kept informed of the progression of the SPD and any future consultations via your dedicated email address.</p> <p>Changes to SPD None</p>

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		<p>the draft Climate Change Mitigation and Adaptation SPD. We trust our comments will be taken into consideration, and we look forwarding to reviewing future iterations of the SPD. Should you have any queries or require any further information, please do not hesitate to contact me.</p> <p>NHSPS would be grateful to be kept informed of the progression of the SPD and any future consultations via our dedicated email address</p>		
Places for London (TfL Property Company)		<p>Note that the views expressed in this letter and attachments are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Places for London is TfL's</p>		<p>Thanks for your comments. Regarding the points you have raised:</p> <ul style="list-style-type: none"> - Borough-level planning context (page 11) - the text you identify is extracted from policies EQ1 and EQ2 in the current local plan and just sets out what the current policy says, for context. Please note that the Local Plan is currently being reviewed.

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		<p>new and financially independent property company, formerly known as TTL Properties under which name our previous representations were submitted.</p> <p>Generally, Places supports Hounslow's vision and strategic objectives for the borough, and we consider the draft SPD to be positively prepared. We have however raised concerns and made suggestions, particularly in respect of the following;</p> <p>Borough Level Planning Context: Places for London raises concerns regarding Policy P11, where it is states- 'in Hounslow, major developments are expected to connect to existing decentralized heating, cooling or power networks or be adaptable for future</p>		<p>- Sustainable design expectations; wording changed as suggested, to be more in line with text in Chapter 3</p> <p>Changes to SPD Illustration on page 20 - wording of 2nd caption at top left of illustration to be changed as follows:</p> <p>Renewable energy - Energy generation should be sufficient seek to match, wherever possible, annual energy use.</p>

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		<p>decentralized energy; they are also expected to evaluate the feasibility and viability of Combined Heat and Power systems (either onsite or beyond the boundary)'. We believe this to be a blanket statement but rather support the advice in Policy P43 – Alternative low-carbon heating options – which states that where developments have a very low heating load e.g. Passivhaus developments, a heat network would not necessarily be appropriate or expected. For the purpose of clarity and conformity we encourage this wording to be added in the overarching statement.</p> <p>Sustainable Design Expectations - Policy 20 states– 'Renewable Energy generation should be sufficient to match, wherever possible, annual energy use'. Whilst Places for</p>		

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		<p>London supports policies to optimise renewable energy generation within developments, we would like to caution that this policy be carefully worded so as not to constrain major projects. We kindly suggest that the sentence is amended to 'Renewable Energy generation should seek to match, wherever possible, annual energy use', such that the policy is clear without being overly prescriptive.</p> <p>Alternative low-carbon heating options - Places for London strongly welcome Policy P43 which states- 'For example, exhaust-air heat pumps (EAHPs) could be considered if the proposal will achieve PassivHaus building certification (secured through legal agreement), such that the small heating capacity of an EAHP is sufficient to supply</p>		

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		<p>the minimal heating demand of the building.' This is in line with Places for London's Net Zero Carbon Roadmap and Sustainable Development Framework.</p> <p>Concluding Remarks - We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me.</p>		
Canal & River Trust		<p>The Trust previously commented on the emerging Climate Change Mitigation and Adaptation SPD in August 2023.</p> <p>Whilst the SPD seems to be a higher-level document, we do consider there are opportunities for</p>		<p>Thanks for your comments. In relation to the points you have raised:</p> <ul style="list-style-type: none"> - The relation of development to waterways: covered in Character, Sustainability and Design Codes SPD. It is out of scope of the narrower focus of this SPD - Use of the canal as a source of waste heat: - there are a

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		<p>additions to strengthen and highlight the potential of the canal network to contribute to the aims of the SPD.</p> <p>The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. It is important that these benefits are clearly identified at the earliest possible stage and the emerging Climate Change and Adaption SPD provides a significant opportunity in this regard.</p> <p>The water flowing through our waterways contains enough thermal energy to produce approximately 640MW of energy. We consider that heating and cooling schemes can be delivered without any adverse</p>		<p>number of excellent sources of waste heat in the borough, which could have potential to supply low carbon heat networks. the feasibility of a number of such sources, including waterways, were assessed in the Heat Mapping and Masterplan Study and Feasibility Study prepared for the council in 2022 and 2023, and published at https://aecom.com/projects/district-energy-scheme-lb-hounslow/. The selection of sources of heat will depend on a number of technoeconomic factors. It is not the place of planning guidance to list these, as any such list will become out of date due to changes in technology and context.</p> <p>- Electric charging for boats: This document provides guidance for applicants for planning permission for new development. Planning law does not apply to boats seeking to convert to electric propulsion - this is therefore out of scope of this planning guidance</p> <p>- Use of the canal for freight: Text at Section 3.3.4 of the SPD is being clarified to contain an explicit reference to encourage use of the river and other waterways for transportation of construction and waste materials.</p> <p>Changes to SPD</p>

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		<p>impact on biodiversity. The canals can facilitate sustainable heating and cooling of canalside developments, such as at GSK in Brentford.</p> <p>However, the potential use of canal water for heating or cooling buildings is not referenced within the SPD though it should be identified as a renewable energy technology to ensure all options are identified and considered at the earliest opportunity. Applicants/Developers should also be encouraged to discuss the options in relation to this and any commercial agreements that would be required with the Canal & River Trust at the earliest opportunity.</p>		None

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		<p>The Trust recognise the value of using our canals and rivers for drainage facilities and the potential for surface water drainage to the canal should also be clearly outlined within the SPD. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. The Trust would require full details of any proposed discharge and any appropriate mitigation measures to ensure there would be no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement.</p> <p>The Trust have been trialling the additional provision of electric</p>		

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		<p>charging points/moorings in some areas so that boats can be less reliant on diesel and move to a more sustainable energy source which may also improve air quality and reduce noise pollution. Support for this could be set out within the SPD and as part of this we would also suggest that support should be provided for boaters wanting to convert to electric propulsion, due to costs being prohibitive for many.</p> <p>We also promote the use of our canals for the moving of freight, with materials such as building materials and waste, being suitable cargoes. This is reflected in Policy SI15 of the London Plan and applicant/developers should be required to consider this potential within the SPD.</p>		

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
Historic England		<p>New development can result in physical and setting change that affects the significance of heritage assets. Furthermore, the SPD covers major renovations and refurbishments. This is particularly relevant to the historic environment as the number of historic homes in the UK grows annually as a result of non-domestic buildings being repurposed and with the emerging emphasis on the retention and reuse of existing buildings, this trend is set to increase. It is imperative that there is guidance to avoid the maladaptation of traditionally constructed buildings, the consequences of which risk harming the building (and, if a heritage asset, its heritage significance) diminishing the inhabitants living conditions and, ultimately, end up being costly to</p>		<p>Thanks for your comments. Regarding the points you have raised:</p> <ul style="list-style-type: none"> - The impact on new development on character and setting of heritage assets is thoroughly covered in the companion SPD on Character, Sustainability and Design Codes. - Guidance on refurbishment of traditionally constructed buildings: clarifications added at pages 8 and 57, in line with suggestions. - Signposting to relevant resources has been updated as you requested <p>Changes to SPD <i>Existing Buildings section (p.8) - 2nd paragraph to have the text in green inserted as shown below:</i></p> <p>Where retrofit requires planning permission – for example major office refurbishments, or conversions of buildings to residential use – applicants are expected to apply the principles set out in this SPD to mitigate and adapt to climate change, as far as is practicable without resorting to demolition and rebuild.</p>

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		<p>remedy with more carbon emissions released than are saved.</p> <p>Our primary advice is that the Existing Buildings section (p.8) is expanded to highlight that major refurbishment of traditionally constructed buildings (i.e. solid wall structures typically of pre-1919 date) requires a different approach, materials and expertise. The reason being that they are designed to absorb and release moisture (i.e. 'breathe'). Making this clear in the introduction of the SPD should help avoid any potential confusion as to why the Major Refurbishment section refers to heritage assets and a 'Whole Building' rather than 'Fabric First' approach as advocated in the rest of the SPD.</p>		<p>and taking particular care with traditionally constructed buildings (i.e. solid wall structures typically of pre-1919 date) requires a different approach, materials and expertise, to ensure that they continue to be able to absorb and release moisture. More detailed guidance on this is set out in Section 3.7.</p> <p><i>Page 57, 2nd paragraph onwards - add in text in green below:</i></p> <p>Developers will benefit from appointing a Retrofit Co-ordinator to prepare a bespoke Decarbonisation Plan, using a 'whole building' approach appropriate to its age and construction method, to set the building on a pathway to zero carbon, with clear staged steps to get there. Historic England provide further information on this approach for traditionally constructed buildings, on their Energy Efficiency and Retrofit in Historic Buildings webpages</p> <p><i>[bold text to include hyperlink to https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/]</i></p> <p>Page 16 - Table, row 1, column 3 (Guidance):</p>

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		<p>links to relevant resources included in Appendix 3. In terms of the latter, we would highlight that Historic England have recently published new planning guidance on Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England Advice Note 18) and have just updated our Energy Efficiency and Retrofit in Historic Buildings webpages, which include information on the Whole Building approach and how to find the right professional help, as well as a series of climate change case studies. We would strongly advise signposting to this guidance within the SPD, perhaps at the end of the Major Refurbishment section or in the Stage 1: Site Assessment table where opportunities for retention and refurbishment are highlighted,</p>		<p>Add in to this box: Historic England's Energy Efficiency and Retrofit in Historic Buildings webpages</p> <p><i>[Underlined text to include hyperlink to https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/]</i></p>

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		and/or at the bullet points in the Major Refurbishment section.		
National Grid		<p>Please see the attached NGET guidance for working near our assets and how to make contact with us ahead of any works and developments near to our assets.</p> <p>I was unable to see the consultation document online to review but this should hopefully be of some use to you.</p> <p>https://www.nationalgrid.com/electricity-transmission/document/130626/download</p>		<p>Comment noted</p> <p>Changes to SPD None</p>
Wendy M.		Housing in this country is a disgrace ...		The SPD seeks to respond the climate crisis through a 'retrofit first' approach – with a preference for converting old buildings

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		<p>Too many people have poor expensive insecure housing which has a huge impact on people's well being ...</p> <p>We need a people's assembly to resolve this problem - looking at + implementing community land trusts - why should people pay rent ?</p> <p>Green solutions - converting unused building into quality "green" homes ...</p> <p>People over profit ...</p> <p>The representation included some videos of the respondent taking part Public Involvement sessions with Richmond Council's Health and Wellbeing Board. There the respondent suggested that many mental health issues are based in material conditions and housing insecurity. The respondent advocated for the development of</p>		<p>rather than demolishing and rebuilding – and by setting out guidance on a range of building performance criteria. Political issues, such as people’s assemblies lie beyond the scope of the current document and, therefore, we are unable to comment on them here. However, affordable housing type and tenure is within the remit of the Local Plan; as a part of preparing the consolidated Local Plan an updated housing needs assessment is being prepared to advise on the apportionment of affordable housing in plan policy. Similarly, issues surrounding medical treatment lie outside the purview of the SPD and expertise of the planning department.</p>

Contact	Do you think the SPD will support the council's aim for new buildings in Hounslow to be net-zero carbon in operation, and suited to the way the climate is expected to change in the future?	Are you content that the changes made to the document reflect the feedback that you have given us and do you have any other comments?	Is the information in the SPD accurate and up to date?	Council response and proposed changes to SPD
		<p>community land trusts to provide access to higher quality housing. The respondent also strongly criticised the use of electroconvulsive therapy.</p>		

Appendix 1:
Statement of Consultation
Summer 2023 Consultation



Climate Mitigation and Adaptation Supplementary Planning Document: Consultation Statement for the first consultation

The first consultation on the draft Climate Change Mitigation and Adaptation Supplementary Planning Document (SPD) took place in summer 2023, in conjunction with consultation on the Adoption draft of the Character, Sustainability and Design Codes SPD. This consultation sought the views of the borough’s residents, businesses and other stakeholders on proposed new planning guidance relating to the delivery of zero carbon development in Hounslow, in line with the requirements for informal first-stage consultation, as set out in the [LBH Statement of Community Involvement \(2020\)](#).

Officers attended seven area forums in June and July 2023, presented the SPDs at a special meeting of the Climate and Clean Air Community Reference Group and held an online workshop with developers active in the borough. Responses were invited via a questionnaire published on the council’s website, via email or via comments made at meetings and workshops. 46 representations were received, as set out in the schedule below:

Representor Category	Response method	Number of responses
Borough resident	Online Questionnaire	14
	Email / Letter	2
Community, voluntary and other interest groups and organisations	Online Questionnaire	3
	Email / Letter	6
Political party or grouping	Email / Letter	2
Local business / employer	Email / Letter	2
Property developer / consultancy	Workshop	3
	Email / Letter	7
Government / statutory organisation	Email / Letter	7
ALL:	Online questionnaire	17
	Email / letter	26
	Workshop	3
	TOTAL	46

The feedback received from the first consultation has been used to update and refine the final draft Adoption version of the SPD. Annex 1 sets out the issues that were raised in responses to the consultation and how those issues have been addressed, in accordance with the requirements 2012 Town and Country (Local Planning) (England) Regulations 2012.

Formal Consultation

The draft Adoption version of the SPD will be released for comment on the Council's website for a minimum four-week period in early summer 2024, following the May Cabinet meeting. The purpose of this formal consultation stage is to ensure the SPD is ready for adoption – feedback from consultation responses will be used to further refine its text prior to adoption by the Council later in 2024. This consultation stage will meet LB Hounslow's requirements for the formal statutory community consultation as set out in the SPD consultation process in its [Statement of Community Involvement \(2020\)](#).

Consultation Process

The draft SPD will be released for comment for a period of 4 weeks. An electronic version of the document will be available for comment on the Council's website and a physical copy will be placed in each of the local libraries and at Hounslow House. An email address and telephone number for the spatial planning team will be made available for comments and for help in responding to the consultation.

Notification will be sent to all Councillors, to all statutory consultation bodies, and to all respondents to the first consultation, electronically or by mail. Developers will be notified of the consultation via email from contacts held by the Development Management and Spatial Planning teams.

The consultation will be promoted to residents through the council's survey platform, Hounslow Matters and other relevant channels. It will also be displayed on TV-screens in all Council-owned buildings including administrative buildings, libraries, housing estates and sheltered accommodation.

Consultation Timetable

The approximate timetable for this is as follows:

- July 2024 – Consultation on final Adoption draft of SPD, for four weeks
- Late summer 2024 – consider comments received and make any necessary refinements to SPD
- Autumn/Winter 2024 – anticipated timescale for adoption of SPD

PRIVACY NOTICE

This Privacy Notice explains how the Council uses personal information collected in the course of consultation on planning documents during work as a local planning authority.

What type of information we hold:

We currently collect and process the following information:

- Your name
- Your email address
- Demographic data (including age range, disability and ethnicity)

Why we need this information and how long we keep your information

The lawful basis for processing your data is: **Public Task** (i.e., the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law).

We are required to collect the names and addresses of those who respond to Supplementary Planning Document (SPD) Consultations as per Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Your contact details will be retained until we receive a request to remove or amend the contact details, or until the SPD is withdrawn or revoked. Retention of contact details is required as per Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Please email ldf@hounslow.gov.uk to remove your account or amend your details.

Anonymous demographic data will be analysed for equalities monitoring purposes & included in the consultation statement. Anonymous demographic data will be deleted following adoption of the SPD.

Your data protection rights

The rights available to you depend on our reason for processing your information. For further information about your data protection rights and how to make a request, please see '[Your rights](#)'

This Privacy Notice links to the [Planning Policy Privacy Notice](#). If you have any questions about this privacy notice, or concerns about how we process your data, please contact ldf@hounslow.gov.uk. This privacy notice will continue to be monitored and updated.

ANNEX 1: Summary of issues raised during 1st consultation, and the council's response

Theme: General Comments	
Summary of Main Issues Raised	Council Response
A number of developers stated that the document is long and detailed and should focus on principles and outcomes to avoid impacts on viability and allow more appropriate solutions to be chosen.	Comments noted, and taken on board where possible. However, a key role of the SPD is to provide more detailed guidance on how the outcomes identified in Development Plan requirements can be achieved.
Queries on how to apply Net Zero for a development already taking place.	New SPD guidance cannot introduce new requirements which are not already included in the Development Plan; nor can it be applied retrospectively to existing applications.
Concerns were raised regarding the overdevelopment in the borough, including whether it needed to happen, pressure on greenspace/ greenbelt, pressure on planning officers and the changing local character, heritage and aesthetics of the borough. It was also highlighted that community infrastructure needs to accompany development.	The rules and requirements on how development across the borough is managed are set out in the Local Plan and the related Character, Sustainability and Design Codes SPD. The Local Plan is currently being reviewed, which provides residents with an opportunity to comment on how development is being managed. However, this is out of scope for this SPD.
Some respondents raised issues relating to the wider built environment, including G&BI and car parking.	This is out of scope for this SPD, however, this is covered in the Local Plan and the related Character, Sustainability and Design Codes SPD.
There were comments on the importance of enforcement and quality of materials used, including building regulations and taking action against breaches of these regulations	This is out of scope for this SPD, however, this is covered in the Local Plan and the related Character, Sustainability and Design Codes SPD.
Concerns were raised on occupant behaviour change to support Climate Change	This will be addressed in Householder Retrofit Guidance, to be published separately
It is important to provide solutions to deal with compostable waste from flats.	Out of scope of this SPD. The Council is rolling out a weekly food waste recycling service to high rise properties. Existing guidance for developers sets out design expectations for flats to enable compostable waste recycling.
It is important that canal boats are provided with more sustainable energy sources.	Comment is noted – however, this is not related to new development, which is the focus for this SPD.

Clarification sought on alignment with sustainable wellbeing outcomes	This is covered in the related Character, Sustainability and Design Codes SPD (to be published separately)
There were concerns raised that the checklist will not form part of the SPD.	The checklist does not set out any additional requirements – it simply brings together in one place, for ease of reference, all the relevant sustainability metrics already included in this and other development plan documents. Completion of the checklist will be required as part of the application process – as such, it will help the council to monitor adherence to the development plan sustainability requirements covered in this and other SPDs

Theme: Issues raised outside of SPD scope	
Summary of Main Issues Raised	Council Response
<p>Comments received on the theme of retrofit:</p> <ul style="list-style-type: none"> - Some respondents wanted more reuse of existing buildings to avoid demolition. This included converting unused buildings into sustainable homes for those in insecure housing and installing solar panels on existing buildings, particularly industrial and commercial. - It was highlighted that retrofitting existing buildings should be the starting point and barriers needed to be removed for this to happen, including incentivising retrofitting. - Some respondents wanted more information on retrofitting, including retrofitting the needs of council estates and guidance for household applications and heat pumps. - Historic England recommended adding a retrofit section to chapter 2 	<ul style="list-style-type: none"> - This Climate Change SPD is only one part of the local planning system, covering the application of existing requirements relating to climate mitigation and adaptation of proposals. The wider local development framework, including the London Plan and Local Plan, govern decisions on whether development is appropriate - The related Character, Sustainability and Design Codes SPD already includes guidance to support re-use and retrofit of existing buildings over new build – this does not need to be included in the scope of this SPD, which focuses on what happens when permission is granted for a new building - The Householder Retrofit Guidance (to be published separately) will provide advice and guidance on aspects of retrofitting existing properties. - References to retrofit of historic buildings added to Section 3.5 (on major refurbishments)
<p>There were ideas raised of using householder planning applications as an opportunity to improve energy efficiency in houses.</p>	<p>In relation to householder retrofit projects:</p> <ul style="list-style-type: none"> - New roofs, windows and extensions are already subject to current building regulations (as set out in Part L 2021), taking into account any constraints due to historic fabric, conservations status etc. - Local authorities have limited powers to require additional consequential energy efficiency improvements.

	<ul style="list-style-type: none"> - Further guidance will be made available in the Householder Retrofit Guidance document, being published separately.
<p>Comments received on the theme of embodied carbon:</p> <ul style="list-style-type: none"> - Some respondents wanted more encouragement of using low carbon and/or sustainable building materials to account for embodied or lifetime emissions in net zero. - Developers raised concerns regarding net zero being misleading if embodied carbon is not considered. - Concerns were raised regarding non-recyclability of uPVC doors and windows, and suggested incentivising installation for more sustainable alternatives, such as wood. - There should be more support for the use of the river Thames and canals as a sustainable transportation option for construction and waste materials. - The importance of building for long life, e.g. 100-year design life. 	<ul style="list-style-type: none"> - Guidance on reducing embodied carbon is already covered in the related Character, Sustainability and Design Codes SPD. The 'Be Lean' section of this document also provides advice on operation of net zero and lifetime emissions associated with construction. - Concerns regarding non-recyclability of uPVC doors and windows will be considered for inclusion in Householder Retrofit Guidance (to be published separately); out of scope for this SPD. - Use of waterways for sustainable construction transport is already included in the related Character, Sustainability and Design Codes SPD. - Building for long design life is already included in the related Character, Sustainability and Design Codes SPD, and indicative targets for building design life included in the Checklist
<p>Some respondents want to see more reference to circular economy and its principles, including rewarding the reuse of discarded fittings</p>	<p>There are sections in the related Character, Sustainability and Design Codes SPD that refer to circular economy, in particular the introduction and Be Lean Section. It's important to note that SPD cannot create new requirements – their aim is to focus on supporting implementation of and adherence to the existing requirements of the current development plan.</p>
<p>Comments received on the theme of flood risk:</p> <ul style="list-style-type: none"> - Concerns were raised around significant amounts of building materials being flushed into street drain during construction, which causes them to become blocked and flood. - Further comments were also raised referring to basements displacing the water table and resulting in flooding. 	<ul style="list-style-type: none"> - This is out of scope for the SPD. - Out of scope for this SPD; will be passed onto the relevant teams so it can be part of the Local Plan review.
<p>Comments received on the theme of green and blue infrastructure:</p> <ul style="list-style-type: none"> - no mention of biodiversity net gain (BNG) in the SPD. - needs to be a stronger application of BNG, including the importance of green and blue infrastructure for climate mitigation and adaptation. 	<ul style="list-style-type: none"> - Provision and design of green and blue infrastructure, including the Biodiversity Net Gain policy, is covered the related Character, Sustainability and Design Codes SPD.

<ul style="list-style-type: none"> - Concerns about development of green spaces, in particular Hatton Fields, and impact on biodiversity and flood protections. - There were comments asking for the Council list of species to be expanded. - Developers should plant more trees and avoid the use of artificial grass, especially in schools and council facilities. - Brownfield development should be prioritised, in particular carparks and other concrete spaces and incorporate greening these spaces, including planting trees, discourage paving over front gardens and creating new parks. 	<ul style="list-style-type: none"> - Advice to discourage householders from paving over of front gardens will be available in the Householder Retrofit Guidance (to be published separately).
<p>Comments received under the theme of the Local Plan and other National Policies:</p> <ul style="list-style-type: none"> - Developers expressed concerns that the SPD was based on out-of-date policies. - Further clarity is required on how the timeframe of this SPD will fit with the Local Plan (LP) review and if this SPD will be revised once the LP is updated. - Policies need to be outcome focused rather than too prescriptive as this limits freedom to deliver the effective long-term strategies. - Too much mention of London Plan and Mayors London Plan Guidance. - Comments from this SPD should inform the review of the Local Plan. - The SPD should be dynamic and flexible to reflect ongoing challenges and the quick pace of technological progress. - Clarification sought on the relationship between this SPD and the Future Homes Standards; and on the likelihood of this SPD being superseded by wider industry requirements and how would this SPD align to them 	<ul style="list-style-type: none"> - Clarification on these points is included in the revised draft SPD - A key role of the SPD is to provide more detailed guidance on how the outcomes identified in Development Plan requirements can be achieved; it is also helpful to identify the relevant Development Plan policies to which the SPD guidance applies.

Under the theme of transport and parking, respondents submitted comments on more safe charging facilities and the reduction in land take with multi-story parking for commercial property.	Out of scope of this SPD. Parking and EV charging are covered in the council's draft Kerbside and Parking strategies
Some respondents wanted to see more Council action to inform residents and business on what changes they can make, particularly on reducing waste.	This is out of scope for this SPD which focuses on new development. The Householder Retrofit Guidance (to be published separately) will provide advice on retrofit measures.

Theme: Sustainable Design Expectations	
Summary of Main Issues Raised	Council Response
<p>Most respondents agreed with the four-stage approach to sustainable development, however, the following general comments on the approach were received:</p> <ul style="list-style-type: none"> - Concerns were raised about the aesthetics, e.g. high density and provision of sufficient neighbourhood green space. - Sustainable design needs to result in affordable service charges and is safeguarded when charges are not met. - Questions were raised on the presumption of development and the trade-off/balance between land take and massing. - Some respondents commented on the provision of community infrastructure and existing pressure on services. - There were questions around Council Officers capacity and expertise to negotiate with developers. - Integrating green and blue infrastructure early in design process. 	<ul style="list-style-type: none"> - These issues are out of scope of this SPD. Where appropriate, they are covered in the related Character, Sustainability and Design Codes SPD and other plan documents within the Development Plan (the London Plan and the Local Plan). - Viability assessment of Local Plan policies, including those relating to sustainable design, ensure that they do not unduly increase costs
<p>Comments relating to Stage One of the Sustainable Development approach were received:</p>	<ul style="list-style-type: none"> - Decisions on the suitability of a site for development, including sustainability considerations, are covered by the related Character,

<ul style="list-style-type: none"> - Concerns that the SPD starts with the presumption of development and should instead begin with site selection that should prioritise brownfield sites. - Site selections should account for future climate change impacts, e.g. flood risk. - Major developments should focus on accessible locations that are close to services and jobs and served by a comprehensive public transport network to reduce trips by car. 	<p>Sustainability and Design Codes SPD and other elements of the Development Plan.</p> <ul style="list-style-type: none"> - This SPD focuses on how to ensure development delivers low carbon once permitted.
<p>The following comments relating to Stage Two of the Sustainable Development approach were received:</p> <ul style="list-style-type: none"> - Concerns that balancing carbon with other considerations was overshadowing green & blue infrastructure. - Climate needs to be balanced with other considerations in development layout and form. - Flood mitigation and resilience is needed to protect development for its full lifespan, with vulnerable parts of development located in lower risk areas. - Concerns raised about excluding buildings with east/west facing glazing - Local Plan review needs to tackle the issue of amenity space standards not being met for new developments as space is available offsite. - This SPD needs to explicitly address the issues of managing damp. - Building heights should be limited to 6 storeys to support achievement of energy balance. 	<ul style="list-style-type: none"> - Balance between climate, sustainability and other considerations is achieved within the Local Plan. This SPD provides additional guidance on climate issues - Flood mitigation and resilience is already addressed in Stage Two of the design process and the wider Development Plan - Buildings with east/west facing glazing are not excluded – just recommended that proportion of glazing on these facades should be reduced as they are more prone to overheating. This does not affect energy generation – south facing PV is 15% more effective than west facing; PV panels can be mounted on roofs to face the sun, regardless of the glazing pattern. - Damp can be tackled through good ventilation systems and is now explicitly mentioned in SPD under indoor air quality - Energy balance is not the only issue impacted by building height. Limiting the building height could result in more land take for new homes, increasing urban sprawl and energy needed for travel, whilst decreasing green space. It is not necessary that every individual building achieves energy balance, as long as this can be achieved by the system as a whole. LETI has calculated that if energy take is below 35kW/m²/yr, it can be met from offsite renewables to enable new buildings to be net-zero carbon by 2030.
<p>Comments relating to Stage Three of the Sustainable Development approach wanted to see more support for Net Zero and monitoring of construction and performance.</p>	<ul style="list-style-type: none"> - Enforcement is an important issue, but not one which can be addressed in SPDs. Enforcement of most Development Plan requirements is a matter for the council's Local Enforcement Plan - this sets out the Council's enforcement system, sets priorities for when and how to take enforcement

	<p>action and outlines timeframes. The Enforcement Plan is currently being reviewed, during which the council will seek to increase the efficacy of enforcement</p> <ul style="list-style-type: none"> - Monitoring of compliance with the London Plan energy hierarchy is achieved through the Be Seen requirement, as referenced in this SPD. The council will review internal procedures to ensure we can more effectively monitor energy performance to ensure development complies with London Plan policy
<p>The following comments were received in relation to Stage four of the Sustainable Development approach:</p> <ul style="list-style-type: none"> - Better alignment with Objective Five in the Local Plan (Maximising the Benefits of Our Green and Blue Infrastructure) to ensure that the green & blue and infrastructure is integrated alongside transport corridors and away from flood risk or where road drainage could impact the water quality. - Provide buffer zones along water courses and space for local nature recovering - Impact of design on services charges. - Concerns raised that the SPD is too complicated for planners to have the time or expertise to enforce. - Concern about requirements/suggestions in 2.3 to carry out operational energy performance modelling and benchmarking RIBA stage 2, as well as reporting unregulated energy use. - Requests for a simpler document that summarises the scope and applicability of all targets/ requirements and which buildings they apply to, for both the SPDs and LP. 	<ul style="list-style-type: none"> - Most of these issues are already addressed in the Character, Sustainability and Design Codes SPD, or other elements of the Development Plan - SPD structure has been simplified, and distinction between requirements and aspirations clarified – it does not impose any additional requirements on developers (or enforcement obligations on the council) than already exist in the Development Plan
<p>Most comments agreed with the guidance set out in part A2, with developers finding it clear, but the following comments were raised:</p> <ul style="list-style-type: none"> - The relationship between the two SPDs is confusing. - Further explanation is required for Figure 2.2. 	<p>Document has been simplified and relationship with Character, Sustainability and Design Codes SPD clarified</p>

Mostly respondents agreed with the list of sustainability policy requirements and checklist. Some raised the following points:

- Would be helpful to highlight specific sustainability requirements in Table 2 (Key Development Plan sustainability policy requirements for new developments)
- Requests for pre-app advice should provide a summary of how the SPD has been considered in design.
- Checklist requirements need to be the basis for enforcement.
- Completed checklist should accompany applications to demonstrate measures adopted.
- Concerns that the SPD is not ambitious enough and should require that all developers reach the highest standard, otherwise developers may avoid these standards.
- Support for the use of a checklist for a smoother progression through development management process however, the checklist seems too rigid and needs to be applied flexibly for specific requirements, e.g. speculative industrial development, where its future use is unknown
- The table 2 policy requirements should be incorporated into existing validation checklist so that all requirements are listed in one location.
- No target included for industrial buildings.
- Further clarity required for supporting information and evidence base.
- Further flexibility required on space heating demand.

The following comments were received from public sector organisations:

- Environment Agency recommend inclusion of Flood Risk Assessments to ensure developments are resilient to climate change related flooding and encourage the improvements of flood defences

- Clearer distinctions have been made throughout the document between, policy, guidance, requirements, aspirations
- Requirements have been clarified: Table 2 now lists all the existing assessments and documentation required in the Development Plan for different scales of development, which have a bearing on sustainability; it is considered helpful to applicants to list these in one place for reference
- The new sustainability checklist sets out the requirements and aspirations for individual sustainability metrics from across the development plan. This will be published separately, for reference and completion by applicants
- Expectations have been clarified on how the checklist levels relate to minimum requirements and aspirations; numerical standards have been updated where necessary
- Clarification on how information will be used to assess applications - submission of a completed checklist will be a validation requirement and used by council development managers to review sustainability of proposals
- Clarified that validation will not involve reviewing individual checklist questions
- Flexible approach to speculative industrial development / shell and core approach, where future tenancy needs unknown – now explicitly stated in SPD

<ul style="list-style-type: none"> - TfL note "a number of instances where the checklist's suggested minimum requirement/low aspiration would be unacceptable in relation to London Plan policy" <p>Specific objections were raised to:</p> <ul style="list-style-type: none"> - Statement that "if the requirements relating to climate and sustainability set out in this table are not met, the application will be refused", as this is inconsistent with the legal framework for planning decisions; applications should be assessed on its merits against the development plan and material considerations. - References to anything other than development plan requirements, for example LETI targets. - Incorporating checklist in validation process, as this should be an administrative exercise - Table 2 repeating requirements from London Plan and associated guidance - Object to inclusion of an ambitious water efficiency standard in Fig. 2.2. - 	
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Theme: Operational Energy & Net Zero Carbon	
Summary of Main Issues Raised	Council Response
<p>General comments on approach to reducing energy use in line with the London Plan's Energy Hierarchy:</p> <ul style="list-style-type: none"> - The drive to increase efficiency and reduce emissions needs to be balanced with living conditions and maintenance/running costs, as well as having exemptions in place for elderly or chronically ill residents. - Repetition with the London Plan needs to be avoided by ensuring the guidance in this SPD is both specific to Hounslow circumstances and more streamlined. 	<ul style="list-style-type: none"> - The measures outlined in the SPD will, as well as reducing carbon emissions, reduce the running costs and increase the comfort for all residents of new homes, including the ill and elderly - Relevant national, London Plan and Local Plan policies and requirements are included for reference where SPD guidance relates to their implementation - SPD application and remit has been clarified, including distinction between requirements and aspirations - SAP references have been updated

<ul style="list-style-type: none"> - The table on pg. 19 makes reference to the National Design Guide, which is part of the Governments PPG, however, it does not reference any policies from the NPPF or PPG, which should be included for accuracy and consistency. - Seeking amendment of the wording on pg. 20 and pg. 23 as this goes beyond the remit of the SPD. - SAP 10.1 reference is out of date and should be changes to SAP 10.2 - Suggest the inclusion of unregulated emissions in targets. - A developer suggested that, while they support ambition for a 45% CO₂ improvement which they are already delivering elsewhere, SPD needs to be nuanced to take into account different sectors; e.g. speculative industrial development which only includes shell, not fit-out; recognition that, at time of application, the energy intensity of occupier will not be known 	<ul style="list-style-type: none"> - Regarding unregulated emissions: this SPD provides guidance on those existing development plan requirements which aim to address sources of operational emissions which developers can control through design and construction on new buildings – these relate mainly to regulated emissions. The SPD also now states that it is good practice to address unregulated emissions, but it cannot set requirements relating to these – this remains a matter for national building regulations and planning policy, and also product standards. Requirements to maximise PV capacity will, however, also help to reduce emissions from unregulated energy use. - The SPD now explicitly recognises the need for flexibility around e.g. speculative industrial development, where only the shell can be considered at application stage
<p>There was broad agreement with the inclusion in Stage One of the energy hierarchy (Be Lean), of details of further action needed to deliver buildings which are zero-carbon on site. In relation to this, the following comments were also received:</p> <ul style="list-style-type: none"> - Concern for the Council’s ability to monitor compliance. - Suggestions to revise the wording on protection of historic buildings in relation to adopting a fabric first approach. - More flexibility is required to reach operational zero carbon balance, for example where LETI SHD and EUI targets are not feasible. 	<ul style="list-style-type: none"> - This SPD does not introduce any new requirements. By providing detailed guidance on existing requirements, it seeks to improve compliance with them and encourage applicants to go further than minimum requirements where possible - This SPD does not override planning controls in relation to historic buildings. Wording on how this SPD applies to major refurbishments now explicitly reflects the need for protection of historic fabric. - Distinction between requirements and aspirations – e.g. in relation to EUI and SHD targets – has now been clarified
<p>Respondents mostly agreed with the proposal to include recommended Energy Use Intensity and Space Heating targets, however, the following concerns were raised:</p> <ul style="list-style-type: none"> - Need to control specification substitution. - Sufficient capacity for inspection and enforcement. - Inefficiency of space heating. - Targets need to be realistic to ensure they are possible to meet. - The definition of a net zero building. 	<ul style="list-style-type: none"> - The Development Plan requirements are outcome-focused – thus this SPD does not seek to control specifications. However, if a change of specification results in an outcome which does not achieve development plan outcomes, this would be liable to enforcement action. - This SPD does not impose any new requirements. In providing detailed guidance on existing requirements, this SPD seeks to improve compliance and encourage applicants to go further where possible

<ul style="list-style-type: none"> - No estimates are made of expected carbon reductions to result from SPD. 	<ul style="list-style-type: none"> - The inclusion of recommended targets for Space Heating Demand is intended to encourage development of buildings in which heat loss is reduced to a minimum, so that space can be heated efficiently - Definition of a net zero building in operation has been clarified - Estimates of expected carbon reductions to result from SPD depend on numerous factors and would be difficult, if not impossible. What can be measured are the absolute emissions of each new development and the extent to which these meet or exceed London Plan targets. This will provide indication of whether new development is meeting expectations or whether further guidance is required.
<p>Further comments on the inclusion of the recommended Energy Use Intensity and Space Heating targets were received:</p> <ul style="list-style-type: none"> - Further clarification is required that Net Zero refers only to operational emissions. Demanding targets should be outlined in a new Local Plan and not in an SPD. - Requests for specific reference to target improvements over Part L 2021 for retail. - Support from TTLP (TfL's commercial property arm) for LETI targets - as these align with their Sustainable Development Framework's Leading Practice scores; and also for Passivhaus standards - which are supported by London Plan Policy S1 ("major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy") - Noting that the good practice EUI targets are actually Passivhaus exemplar; requesting that if EUI calculation is required for planning submissions that it needs to be made more explicit. - Some respondents wanted practicability and flexibility in the application of zero carbon targets - Request for further information on evidence for and feasibility testing of SHD targets for industrial development for which the 	<ul style="list-style-type: none"> - Now clarified that this SPD deals mainly with operational energy use and carbon emissions. Embodied emissions are important but are dealt with in other guidance, such as the Character, Sustainability and Design Codes APD - The role of the SPD is to provide additional detailed guidance on meeting the requirements set out in the adopted Local Plan. The Local Plan is currently being reviewed. Updates to the policies and targets relating to climate mitigation and adaptation will be considered as part of that process. - While the SPD recommends the achievement of particular EUI and SHD targets, it cannot set new requirements. However, it now more clearly refers to the requirements set in the London Plan's updated Energy Assessment Guidance, to calculate and report EUI and SHD for new major developments - Applicability of SHD recommended targets for industrial buildings has now been clarified

<p>future tenancy is often unknown. Exemplar level is above PH standard for residential.</p>	
<p>A number of comments and concerns were raised on the Council's guidance under Stage 2 of the energy hierarchy (Be Clean), on connecting new developments to district or communal heating systems:</p> <ul style="list-style-type: none"> - Concern that DHN pipes will disturb green spaces/corridors - Concerns were raised over the affordability of this for both minor projects and for residents and therefore DHN should be metered. - Concern that the expectation on major schemes to prioritise DHN development is unduly onerous, in the absence of viability testing. - Further clarification needed on whether connections to DHN will be subject to the progress of such a plan and the viability of making connections. - Seeking that DHN requirements are flexible to accommodate speculative, shell and core developments of similar. - Concerns about the impact of the DHN on archaeological remains. - Supporting the use of canals and rivers to provide heating and cooling for developments. - Concern about the wording in the SPD that gas boilers will be effectively eliminated. - Industrial buildings may need gas supply for industrial processes and therefore cannot have a complete prohibition. - Request for more information on DHN capacity. - Concern regarding planning issues with PV and noise from heat pumps and would like to see a change in approach or recognition of the need for these in development control systems. 	<ul style="list-style-type: none"> - SPD now clarifies that pipework will mostly be laid on existing roads, but would provide the opportunity to create new green corridors on these, e.g. for sustainable drainage above pipe routes, where space allows. If laid in green spaces, pipework will aim to follow existing paths to avoid trees and areas of biodiversity. - Any requirement to connect for new buildings will be dependent on the cost being comparable with that for fitting a new boiler or heat pump. - It is a legal requirement that customer bills are based on heat use. New heat network regulations mean that costs to consumers will be regulated in a similar way as for gas and electricity - The expectation that major development should prioritise HN connection is not new – it is already a requirement in the London Plan, and is only reiterated in this SPD to place it in the context of specific Hounslow heat network proposals. The SPD text has been updated where necessary to clarify this. - Upcoming zoning legislation will in effect establish the viability case by identifying those areas where DHN is expected to be the lowest-cost means of decarbonising heat, and the circumstances in which buildings will be required to connect. - The regulations on protection of archaeological remains during excavation for a heat network will be the same as for any other utility or building, and will be a matter for the DHN delivery company to ensure they comply – not a matter for this SPD - The use of canals or rivers as a source of heat will be a matter for heat network developers, who will need to consider the cost and practicability of the available low carbon options - Wording on gas boilers clarifies that the use of gas boilers as the primary source of space heating and hot water in domestic properties is expected, in most cases, to be incompatible with the requirement to achieve at least 35% reduction in carbon emissions beyond Part L 2021. Does not relate to industrial uses, back up plant, etc.

	<ul style="list-style-type: none"> - Information and links to recent DHN studies now provided in SPD - including on heat network potential and proposals in the borough. - While not in scope of this consultation, the spatial planning team will see if planning issues relating to PV and noise from heat pumps can be addressed in the new single Local Plan.
<p>Most respondents supported the guidance set out in Stage 3 of the Energy Hierarchy (Be Lean) on solar panels fitted to new developments. The following comments were received:</p> <ul style="list-style-type: none"> - Concern about the impact on viability of targets for solar PV - Clarification sought on statement that ‘all buildings must be 100% powered by renewables’ – including definition of 100% renewable energy and whether this applies to regulated energy only. - Suggesting combining PV with limiting buildings to 6 storeys to prevent overshadowing - living conditions and running costs need to take priority for residential developments; concern about impact of cost of PV - concern about impact on heritage buildings and conservation considerations - EA support for proposal that energy demand should be met through on-site renewable energy generation, using approaches which minimise risks for people and environment, are fit for future and resilient to impacts of climate change - Concern that LETI 70% target is onerous, may be competing needs - concern about recyclability / end of life of PV - concern about dismissal of wind turbines, seeking an independent audit of potential across borough - Lacking PV generation intensity target for industrial buildings; suggest that this could be defined by the regulated operational net zero target, equivalent to achieving an A+ rated EPC performance 	<ul style="list-style-type: none"> - Any targets for PV generation capacity, beyond those which arise out of Part L 2021 and London Plan 2021 requirements, are aspirational. Applicants can, however, expect case officers to seek to understand why this target / ambition might not be achievable in individual circumstances. - Wording and meaning clarified in SPD – this relates to onsite renewables, and the aspiration that as close as possible to 100% of onsite energy use – included unregulated uses – is met through onsite renewables. It is understood that this will often not be possible in an urban setting, but that should not stop us from trying to get as close as possible - Many considerations are taken into account when assessing the appropriate height of development in a location, of which overshadowing is one. These matters are dealt with in other planning documents and are out of scope of this SPD - Onsite energy generation can reduce energy costs for residents, and are much more cost effective to fit when a building is being built, rather than afterwards - This SPD applies to new development (or major refurbishments in which building elements are replaced). Most works to heritage buildings will therefore not be in scope. Nor does this SPD affect any existing protections for the setting of heritage buildings. Design and conservation area impacts are dealt with in the related Character, Sustainability and Design Codes SPD - LETI’s recommended PV coverage proportions do take competing demands into account in assessing what might be achievable. Furthermore, SPD now clarifies that green roofs can coexist perfectly well with PV, and improve its efficiency by reducing ambient temperature. - PV will play an important role in getting the UK to net zero and its use is supported by all major political parties. End-of-life disposal and recyclability are a matter for product standards, not planning guidance

<ul style="list-style-type: none"> - concern that current costs of battery storage are too high for it to be viable 	<ul style="list-style-type: none"> - Wind turbines unlikely to be viable as part of a building development; while wind-farm developments are out of scope of this SPD - The difficulty of setting a PV target for industrial buildings, and alternative metrics to use, is now discussed in the SPD. - Provision of batter storage is included as a consideration, not a requirement. Technology costs are rapidly changing and what is viable to include will also therefore change in time
<p>The following comments were received in relation to Stage Four of the Energy Hierarchy (Be Seen):</p> <ul style="list-style-type: none"> - Concern raised about the council's ability and Officers capacity to enforce existing and new standards - Further clarification on what can / should be done to sanction and/or rectify failures? E.g. if: <ul style="list-style-type: none"> - development fails post-occupancy evaluation (POE)? - additional ambitious energy targets (beyond essential) are not met? - UGF fails after installation? - further detail requested on proposals for post-occupancy evaluation (POE) and clarification of council's goals for this. - Concerns that POE proposals may conflict with certain development types, e.g., data centres may be reluctant to disclose energy monitoring / EUI data, due to commercial sensitivity - [Advice on] Health IA seems incomplete 	<ul style="list-style-type: none"> - The SPD does not include any new standards – it provides guidance to developers on the existing standards in the Development Plan. It aims to improve compliance by providing guidance on how standards can be achieved and reducing the level of ambiguity and therefore opportunity to avoid compliance - Enforcement is an important issue, but not one which can be addressed in SPDs. Enforcement of Development Plan requirements is a matter for the council's Local Enforcement Plan - this sets out the Council's enforcement system, sets priorities for when and how to take enforcement action and outlines timeframes. The Enforcement Plan is currently being reviewed, during which the council will seek to increase the efficacy of enforcement. - The SPD clarifies that requirements for post-occupancy evaluation relate to operational energy generation and use, in line with existing London Plan policy SI 2. This is to be reported via the GLA's 'Be Seen' portal, as set out in the Be Seen – Energy Monitoring Guidance. A key aim of the 'Be Seen' monitoring is to gather data and identify situations where renewable technology is not working/not achieving its capacity, so that a property owner may be assisted in maximising the benefit. There will be conditions attached that may be enforced against, which will be done through the statutory enforcement process. - Requirements relating to Health Impact Assessments are now clarified

Theme: Carbon Offsetting	
Summary of Main Issues Raised	Council Response
<p>Many respondents agreed with the Council's proposal that the Carbon Offset price should be increased to incentivise onsite carbon reductions in new developments. Some respondents left the following comments in relating to this:</p> <ul style="list-style-type: none"> - Consider the methodology to be flawed, e.g. because the definition of net zero does not include unregulated emissions or embodied carbon; and because the SAP methodology not correctly reflecting emissions over a building's lifetime - The suggestion that applicants would have to submit/pay for a viability assessment, is onerous and goes beyond London Plan policy SI2 and Mayor's Energy Assessment Guidance. They consider that the established practice of case officers scrutinising energy assessments and challenging the feasibility of making further on-site reductions, and balancing competing demands, provides an appropriate framework for testing compliance with Policy SI2, w/o need for viability assessment. Also inconsistent with the Mayor's drive to avoid viability testing through the fast-track approach to affordable housing - Payments from applicants for the cost of independent viability assessments should be the rule rather than the exception in order to overcome the current situation whereby developers and landowners gain fortunes by virtue of dubious viability assessments. - Goes against NPPF paragraph 58, where it is clear that if up-to-date policies have set out the contributions expected from development (in this case the London Plan carbon offset costs), planning applications that comply with them should be assumed to be viable and no site-by-site basis viability is needed. 	<ul style="list-style-type: none"> - It is acknowledged that the offset payments policy only covers regulated operational carbon emissions – this is in line with what is permitted by London Plan policy SI 2. - The SPD is now clearer that it is focused on operational carbon, with embodied carbon covered by other policies and guidance - Wording around viability has been clarified. Wider factors – such as stricter requirements in London Plan policy, the development of a more robust evidence base on costs of meeting higher standards, and further viability work to be undertaken by the council to support any future introduction of a higher carbon offset price through the new Local Plan – should reduce the need to assess viability of energy efficiency standards on a case-by-case basis
<ul style="list-style-type: none"> - Need for balance between three sustainability pillars, e.g. affordable housing, biodiversity benefits or community infrastructure. - Support for the policy and suggestion that offsetting payments are used for projects which are additional, have permanence, are robustly monitored, used as a last resort, linked to local environmental policies and opportunities - consider offsetting to be discredited and could let developers off the hook 	<ul style="list-style-type: none"> - Additional clarity in text that carbon offsetting is intended to be a last resort, when all other reasonable means to reduce carbon have been exhausted. - Link included to council's web page on Carbon Offset Fund

<ul style="list-style-type: none"> - concern that new buildings will be approved which will lock us into unsustainable energy consumption for many years - seeking information on the Council’s carbon offset fund – the amounts collected and how it is spent. - careful consideration should also be given to the implementation date, given the unprecedented cost inflation that is being experienced generally so that it does not have the unintended consequence of stifling development. 	
<p>In response to question about whether the proposed level of at least £350 per tonne was set at the right level, respondents provided the following comments:</p> <ul style="list-style-type: none"> - concern about deterring all development, especially smaller developers who may view this as a barrier. A sliding scale would be better. - Clarification needed on which tonnes of carbon the offset charge would apply to - support from one industrial developer - considered a suitable level to incentivise carbon reduction measures - concern that would lead to designs not in keeping with heritage / character - agree that should be increased, but rationale for increase not clear; and concern would lead to higher development costs with impacts on affordable housing delivery - do not consider incentivisation of onsite reductions an appropriate basis for setting the price, as Footnote 155 of the London Plan (2021) states: “Boroughs should develop a price for offsetting carbon using either a nationally recognised carbon pricing mechanism or a price based on the cost of offsetting carbon across the Borough” - Not fair to penalise developers if they have already reduced carbon by as much as feasible - may impact on viability / discourage development - Before proposing a new carbon offset price, the Council needs to undertake and publish local viability evidence to support the price. This viability evidence needs to be up to date and based on performance against Part L 2021 - general assumption that development will be viable based on ‘only’ a 1.7% increase in construction costs is naïve - even a small increase can render brownfield development unviable. - procedurally, can only increase price in Local Plan where all requirements are tested together 	<ul style="list-style-type: none"> - We will not be using this SPD to implement changes to the carbon offset policy immediately; rather, we will use the feedback received here – along with other sources of evidence, including an updated viability assessment – to inform the future updates to the policy as part of the new single Local Plan. This work will include consideration of how we ensure that any policy changes or price increases do not unduly inhibit small developers, whilst ensuring developers still seek to minimise onsite energy use and carbon emissions as far as possible. - Rationale for increase has now been clarified in SPD – this relates to the desire for it to better reflect the real cost of offsetting in the borough, while also being mindful of the potential effect on viability. However, the SPD still notes that, while not the basis for a price increase, a price set at the lower end of the scale for carbon offset measures would nonetheless incentivise higher energy performance standards, by removing the temptation to use offsetting as an easier / cheaper alternative

<ul style="list-style-type: none"> - The use of official DESNZ carbon price and methodology would have both theoretical and practical advantages over ‘home-made’ charging regimes. While the Government cost per tonne figures are lower than those suggested by Hounslow, this would be more than offset by charging for all [including unregulated] emissions. Agree that onus is on developer to demonstrate if requirements are not viable. - The council should review the impact that a £350/tCO₂ carbon offset payment may have on the viability of development proposals. - Will have an impact on deliverability / viability for Affordable Housing providers. Request that evidence base to be included - New costs hits developers who’ve already bought land; and may cause distress if costs go up too much. There might be some impact on delivery initially – some (not all) developers may have to bear costs of £250k on a typical 100k sq.ft development. But the price increase will get ‘baked in’ to price for new acquisition, so should be absorbed in long run and have the intended effect. - Need to set out how updated carbon-offset charge would apply to non-domestic buildings / different typologies – based on what is thought to be achievable; more work needed on how it should apply to speculative development 	<ul style="list-style-type: none"> - These changes would seek to ensure more vigorous application of existing standards. This will not overwrite existing legislation and policy protecting heritage and character; rather a balance would continue to be sought through appropriate design - Links now included in SPD to the 2023 Delivering Net Zero report, which provides supporting evidence for this proposal
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Theme: Designing for a Changing Climate	
Summary of Main Issues Raised	Council Response
<p>General agreement for the Council’s proposed approach to tackle overheating in new developments; respondents provided the following comments:</p> <ul style="list-style-type: none"> - Need to address Urban Heat Island effect - Recognise role of green and blue infrastructure in cooling environment - Use green space to tackle UHI; e.g. develop only brownfield sites, and minimise development footprint - go further on trees - targets for retention and planting of trees and GI on development sites 	<ul style="list-style-type: none"> - SPD highlights the important role of green space in managing urban heating and integrates with existing related development plan policies and emerging guidance in the CSD SPD which covers this. This includes the Urban Greening Factor, the Hounslow Tree Plan and Management Policy, and Biodiversity Net Gain policy, which provide strong support for greening and prioritise provision of higher quality green space, including trees. - SPD highlights role of ventilation in tackling all indoor air quality issues, including moisture management and overheating

<ul style="list-style-type: none"> - Need to deal with dampness [i.e. condensation] with appropriate ventilation, including energy-efficient mechanical ventilation, especially in kitchens and bathrooms, and ability to cross-ventilate - Windows which are big enough and openable important for wellbeing and character - Concern that guidance on windows will exclude east-west oriented glazing, harming character, wellbeing and energy generation potential - Use of high-albedo materials as a default - Single aspect flats should be banned - standards must be based on worst-case scenarios set out in SPDs and UHI 	<ul style="list-style-type: none"> - SPD sets out a cooling hierarchy which developers are expected to follow - Window sizing and natural ventilation are covered in the cooling hierarchy; balancing the need for sufficiently large windows with other considerations such as overheating risk. This does not exclude east/west oriented windows – these just need to be sized and designed appropriately to ensure homes, and in particular bedrooms, do not overheat. (which also has a significant impact on wellbeing). Now does the guidance impact on the orientation of buildings or roofs, or have any impact on energy-generation potential (NB: PV is most effective when facing south, then west). - Cooling Hierarchy also includes use of high albedo materials - Dual aspect dwellings are encouraged and single aspect dwellings are discouraged under existing development plan policy (London Plan Policy D6, SI 4; Local Plan Policy CC2). - Robust overheating modelling of new developments against extreme weather scenarios is encouraged as strongly as is possible under existing development plan policy and building regulations
<p>The following comments were received in relation to the advice provided on reducing water use:</p> <ul style="list-style-type: none"> - Mandate low volume flush toilet and water saving shower heads - Environment Agency (EA) strongly recommends reducing water use to more sustainable levels, potentially enabling more development with same water resources. Recommends max. 110 l/p/d in water-stressed areas (below 125 in Building Regs), and that new non-residential development => 1000sqm gross floor area should meet BREEAM ‘excellent’ standards for water consumption. - 75 l/p/d limit suggested in Fig. 2.2 not in line with Local Plan EQ2, which aligns with London Plan (i.e.105 l/p/d). Should be presented as aspirational targets that developers aim for, rather than additional requirements. 	<ul style="list-style-type: none"> - The SPD now aligns with and reiterates the existing requirements set out in the Development Plan. These include requirements for water-saving measures – such as low flush toilets, low flow taps and showers – and the limit set in the London Plan of 105 litres per person per day (l/p/d) for indoor water use (plus 5 l/p/d for watering gardens). This is the level recommended by the Environment Agency for water-stressed areas. Anything beyond this standard is presented as aspirational only - Fig. 2.2 will be updated before final version is published - Targets now also included for commercial buildings - Measures such as greywater recycling and rainwater harvesting are strongly recommended, in line with existing policies in the London

<ul style="list-style-type: none"> - Target only set for residential buildings – should also include commercial buildings - EA support requirement for rainwater harvesting and greywater recycling. - Support for greywater use for toilets, heating systems and watering of the proposed “space for food-growing” - Concern that rainwater harvesting can be expensive and challenging on constrained sites; seek that this is more clearly reflected, and requirements kept flexible to accommodate varying water use patterns or different types of commercial development, speculative development, shell and core or similar. E.g. for storage or warehouse building types with a very low internal water consumption, could be more beneficial to utilise rainwater for planting irrigation or potentially vehicle wash where appropriate. - Concern about enforcement of existing regulations - experience of toilets in new residential and school developments being connected to rainwater outfalls instead of sewage outfalls. Action needed to rectify - EA seeks SPD to also include measures to reduce flood risk / increase climate resilience 	<p>Plan. The new single Local Plan will also look to strengthen local policy accordingly.</p> <ul style="list-style-type: none"> - SPD now includes suggestions for alternative uses for grey- or rainwater, e.g. for buildings with low internal water use - Enforcement is an important issue, but not one which can be addressed in SPDs. Building Regulations are enforced by the council’s Building Control function. Enforcement of Development Plan requirements is covered by the council’s Local Enforcement Plan. This sets out the Council’s enforcement system, sets priorities for when and how to take enforcement action and outlines timeframes. The Enforcement Plan is currently being reviewed, during which the council will seek to increase the efficacy of enforcement. - Many measures to reduce flood risk and increase climate resilience are covered in other documents and are out of scope of this SPD – for example, policies relating to green and blue infrastructure are included in the related Character, Sustainability and Design Codes SPD and elsewhere). The SPD does now include recommendations that, where there is a risk of flooding, new developments incorporate: <ul style="list-style-type: none"> • Finished Floor Levels) that are built to the appropriate levels, including climate change allowances • other flood resistance and resilience measures such as physical barriers, raised electrical fittings and special construction materials
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Theme: Major Refurbishments in Scope	
Summary of Main Issues Raised	Council Response
<p>Respondents provided the following comments on the guidance on major refurbishments:</p> <ul style="list-style-type: none"> - Some respondents considered the guidance to be unnecessary or 'over-the-top' - Concern that reliance on judgement rather than quantified criteria would risk standards being watered down in face of viability concerns - Concern about recommendation for "breathable insulation" – Grenfell exposed the limitations of both manufacturers' product claims and local authority enforcement - Seeks inclusion of potential impact of retrofit on biodiversity (loss of nesting & roosting sites due to energy-efficiency retrofit); and also, opportunity for mitigation through buildings-based biodiversity e.g. bats & red-listed birds such as swifts & sparrows - EA supports these policies; seek to include water use reduction requirements - Measures to disincentivise demolition must be applied flexibly, e.g. where market has demonstrated no interest in continued use of existing building; 	<ul style="list-style-type: none"> - A flexible and proportionate approach is taken to incorporating energy efficiency into major refurbishments – this should now be clearer in the text. - Concerns are noted about risk of standards being watered down. However, flexibility is important for retrofit; the guidance accepts that existing buildings are unlikely to be able to achieve same standards as new build, but savings of embodied carbon still make this worthwhile - Fire safety regulations for building materials have been tightened in response to Grenfell, through changes to building regulations and the Building Safety Act. The use of such external cladding systems is in any case unlikely to be an appropriate solution for any historic buildings, to which the text on breathable insulation refers. Rather, Historic England suggests using materials such as Hemp-lime composites or Wood-fibre panels - Information on actions to support bird and bat nesting when retrofitting homes will be included in accompanying Householder Retrofit guidance, to be published on the council's website. - The scope of this section has been broadened to include adaptation, including water reduction measures - The measure to disincentivise demolition is an existing positive measure to reward retention; it does not prevent demolition which continues to be permitted, subject to existing planning controls and the guidance in the related Character, Sustainability and Design Codes SPD
<ul style="list-style-type: none"> - Historic England do not advocate a fabric first approach for the retrofit of traditionally-constructed buildings. Major redevelopments involving heritage assets need to provide careful consideration of how 	<ul style="list-style-type: none"> - Wording on traditional and historic buildings now refers to a 'whole-building' approach, rather than 'fabric-first'

<p>sustainable energy measures may be incorporated without adversely impacting on the significance, character, function and preservation of a specific area or asset, in accordance with the policies on design in this Local Plan.</p> <ul style="list-style-type: none"> - Residents of old properties / historic areas should seek advice from a heritage consultant or the Council's conservation officer - Support reuse of buildings where possible; but need to reflect costs & challenges by allowing for a whole-lifecycle approach to both embodied carbon and construction costs - Reflect practicability of retrofit measures; e.g., if not replacing roof of industrial building as part of short-term refurb, weight of full PV requirement may not be borne by current roof 	<ul style="list-style-type: none"> - The recommendation that residents of old properties / historic areas should seek advice from a heritage consultant or the Council's conservation officer is accepted, but is better placed in the accompanying Householder Retrofit Guidance, currently being prepared for publication – this relates specifically to existing homes and buildings (to be published separately) - The retention of existing building elements which remain in good order is encouraged to avoid unnecessarily increased embodied carbon emissions - SPD now clarifies that PV requirements only apply insofar as it is compatible with the existing structure, or where the roof / relevant building element is being replaced anyway.
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