Introduction

Public consultation took place on the new Sustainable Construction and Climate Change Adaptation for a period of five weeks between Monday 28th November 2022 to Friday 6th January 2023. The consultation period was extended from the usual four weeks to account for the closedown over the Christmas period.

A total of 85 comments were received from 14 respondents.

Who we consulted

- Duty to Cooperate Bodies
- Bodies and organisations with a topic specific interest
- Developers and Agents active in the Borough
- Housing Associations active in the Borough
- Parish Councils
- Equality Forums

How we consulted

- Emails or letters sent to the above consultees
- Press advert in the Barnsley Chronicle
- Press Releases (including use of the Council's social media) and in the 'Our Barnsley Weekly Newsletter'.
- Documents were made available on the Council's website
- Documents were made available at Library@the Lightbox and Branch Libraries across the Borough (online and paper form)

Response to Consultation

The tables below set out the main issues raised during consultation. They summarise the main points and any key changes made to the documents as a result of comments received.

General/ overarching comments

NUMBER OF COMMENTS: 85		
MAIN ISSUES RAISED	**Number**	**HOW THE ISSUES HAVE BEEN ADDRESSED**
Was not aware of the consultation.	2	Consultation was publicised. People that have previously requested to be involved were notified direct.
Concern that consultation ran over the festive period. Requested that consultation be extended/re-advertised/ re-run.	2	The required consultation period for Supplementary Planning Documents is four weeks. We extended the consultation period for a week to cover the close down during Christmas and New Year.
No Statement of Community Involvement available and questions whether consultation met the regulations. Quotes regulation 12 and regulation 35. Requests that Statement of Community Involvement is made available on our website.	1	We have a Statement of Community Involvement available on our website. Hard copies are also available at Library@thelightbox and branch libraries. The text in the draft SPD that refers to this summary document, which is a statement of consultation. This text is included in the consultation document as it would be text in an adopted version. No earlier consultation had taken place. We consider the regulations have been fully met. The Statement of Community Involvement that sets out how we will undertake consultation on planning documents is on

		the website. **https://www.barnsley.gov.uk/media/15691/sci-april-2020.pdf** This document is the statement of consultation that sets out the consultation responses received on the Sustainable Construction and Climate Change Adaptation SPD.
Welcomes opportunity to comment, no substantive comments to make.	1	Comment noted.
General support • Welcomes content as a means to help further improve the sustainability of development taking place within Barnsley. • Strongly support. Wants to see more consideration of the ecosystem that is being destroyed or damaged by the construction, and this should be valued at more than its utility as a carbon sink or flood plain, because the ecosystem has value in itself, as well as the services it provides to us, so there needs to be a powerful reason to lose it. • Supports the reference in the SPD to the Future Homes Standard and Future Building Standard, and the recognition that the SPD is intended to be complementary to the applicable Building Regulations (i.e. as existing and in future). Supports the Council in expecting all new development to adhere to Building Regulations standards as a minimum, and encouraging higher standards where possible. • Happy with all sections of the SPD in summary. Would like to see large new buildings making use of wood, supports using recycled aggregate for foundations and for surfacing of paths etc. Considers it important that organisations such as councils, colleges and universities lead by example and actively promote the use of timber in buildings, in addition to methods in the SPD. • Supports reference to geodiversity in policy RE1 quoted in the SPD.	4	Comments noted.

SPD goes beyond remit of SPD's • Highlights that PPG confirms SPDs should build upon, and provide more detailed guidance on adopted local plan policies and that SPDs cannot introduce new planning policies. • Quotes local plan regulations. Considers documents containing development management policies intended to guide the determination of planning applications is a local plan and must follow relevant local plan procedures, including independent examination. Considers the requirements of the proposed SPD in relation to whole life carbon assessments, facing materials, living roofs, water consumption, zero onsite emissions and waste bin provision are all policies which intend to guide the determination of planning applications. • considers the point that the proposals should not be part of an SPD but in a development plan is supported by the Inspector's Report on the Examination of the Barnsley Local Plan (December 2018) which concluded that references to "sustainable design and construction techniques…would be more effective as a standalone policy" • National Planning Policy Guidance (NPPG) clearly states that LPA's can only introduce set higher energy efficient standards in their development plan policies, subject to not exceeding Level 4 of Code for Sustainable Homes (CfSH). • Seeks clarity on which policy requires a Whole Life Carbon Assessment • there is a lack of connectivity between several points within the SPD and the adopted Local Plan policies, resulting in the SPD appearing to create new planning policies via an inappropriate method. • Objects to new requirements	9	We consider that the requirements we have included in the SPD are not creating new policy and can be included in SPD using Local Plan climate change policies, particularly policy CC2 Sustainable Construction as a hook. The Council considers the SPD is providing more detailed advice to support the existing Local Plan climate change policies such as CC2 Sustainable Construction. It is not seeking to create new policy. The reference made to the Local Plan Inspector's report relates to an earlier version of the plan which contained CC1 and CC2 as one policy. CC2 is the 'standalone' policy referred to in that context. SPD welcomes and encourages higher standards where possible. It is not making them mandatory. The additional requirements the SPD seeks are Whole Life Carbon Assessments and Living roofs. We consider these requirements to be reasonably related to, and further detail to support implementation of Local Plan CC2 Sustainable Construction.

• Apart from the odd new requirement over and above the local plan requirements, section 9 on Modern Methods of Construction is a list of options to consider when building new homes. Suggests could be an informative instead of SPD		
Recommends that the referenced points be removed and a formal review of the Local Plan be undertaken.	1	The Local Plan has been reviewed and the position has been established. Full Council has agreed that no update in whole or in part is to take place until 2027 unless required earlier.

Viability issues • SPD should not add unnecessarily to the financial burdens on development. • Suggests a viability assessment of SPD • Concern about impact on viability • the proposed policy requirements will increase both the cost of preparing planning applications and build costs which will impact on the viability of development and therefore housing delivery. • Considers the Council will need to consider the costs associated with the use of these sustainable materials, the potential impact that they may have on the viability of development, need to balance the sustainability of these materials with other policy requirements and other sustainability considerations. • Considers document too prescriptive • If the Council is to introduce a policy in relation to WLC it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. Also concerned around the costs in relation to this requirement in providing the assessment and in addressing any issues it may highlight.	2	Negotiations can be made in individual cases where there is evidence that viability is an issue. Should viability be proven to be an issue this can be considered at planning application stage. No change proposed.
Use of SPD/ purpose	3	The requirements of the SPD are related to Whole life carbon

• Concern about how SPD will be used in decision making. • A lot of the content is aspirational, guidance and signposting to other legislation. Questions the purpose of the SPD. • Not clear which policies individual points link back to, a linking policies to relevant text within SPD would be helpful		assessments and green roofs. For clarity these have been put into text boxes. Other parts of the SPD seek to welcome and encourage higher standards, where possible, it doesn't say they are mandatory. Add cross referencing to relevant Local Plan policies.
Considers the statement in Policy RE1 on Low Carbon and Renewable Energy that all development "*should at least achieve the appropriate carbon targets as defined in the Building Regulations*." applied to the building regulations in play at the time of the local plan adoption, although given the lead in time for preparing the local plan, in reality could have been applied to a earlier version of the Building Regulations prior to 2019. Building Regulations has since been amended, where a higher benchmark has been set on existing requirements and new requirements have been introduced. For example Part F, L, O and S that came in to effect in June 2022. It is therefore fundamentally obvious and clear that all development which is in compliance with today's building regulations not only at least achieves the appropriate carbon targets in the Building Regulations in place either prior to or in 2019, but will be in excess of that standard. Thus, this policy will automatically be met via building regulations and will continue to exceed them as and when they are amended.	1	Comments noted. Development must as a minimum adhere to the latest Building Regulations standards applicable to it at the time of gaining approval, not the standards that were in force at the time of Local Plan preparation. From the presence of 'at least' in the adopted policy, it is clear that higher standards will be welcomed, which is what we are seeking to encourage in this SPD. No change proposed.
At 10.3, the SPD is being used to introduce a new requirement via planning condition on all new residential development to comply with Part G of the Building Regulations. First, this is a new requirement and is not something contained within the local plan. Secondly, it is being sought by condition, which in itself, would fail the six tests as it is a duplication of other legislation. Instead, the Council could ask developers to consider this and the only legal way in which this could be introduced into a decision notice is as an informative and not a condition.	1	Comments noted. Requirement to be deleted.

MAIN TECHNICAL ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
Considers the statement about renewable energy schemes not being approved if they harm landscape/ appearance is too strong, and a balance needs to be struck so that we can develop sufficient low carbon generating capacity.	This comment appears to relate to the text in Local Plan policy RE1. The wording of a Local Plan policy cannot be changed through SPD. No change proposed.
Requests inclusion of a criteria to facilitate active travel. Home and business design and location needs to move away from assuming everyone has one or more cars, to providing space for safe active travel.	We have a separate Sustainable Travel SPD. No change to the Sustainable Construction and Climate Change Adaptation SPD.
Requests a ban of plastic grass and excessive hard surfacing.	This cannot be done through this SPD. It can encourage designs to ensure surfacing is permeable and encourage real grass to be planted. The following sentence will be added to the end of paragraph 10.4. 10.4 …..Support will be given to permeable surfaces and real grass as opposed to artificial grass.
(2.3) Thinks there is nothing wrong with minimising waste and pollution, and adapting to climate change, making economic sense as well as environmentally. Mitigation is a different issue and even where possible can/will be expensive.	Comments noted no change to SPD proposed.
(2.6) Queries why the Council's Sustainable Energy Action Plan (SEAP) sets out a range of measures to achieve net zero by 2030 and 2045. Queries why the rush, involving excessive cost, when national government's targets are so much less aggressive. Considers the bulk of emissions are from electrical energy and transport, largely outside the control of BMBC, so how can BMBC achieve these goals without relying on progress outside their control?	The Sustainable Energy Action Plan commits the council to being zero carbon in its operations by 2040 and 2045 for the rest of the borough. For further details please visit: https://www.barnsley.gov.uk/media/19254/seap.pdf Comments noted no change to SPD proposed.
(Policy CC1) Giving preference to development of previously developed land in sustainable locations sounds good but relates that point to a Local Plan allocation.	Comments noted no change to SPD proposed.
(Policy CC1) Promoting investment in Green Infrastructure to promote and	Comments noted no change to SPD proposed.

encourage biodiversity gain sounds good but taking farm land out of use and using a computer model to “prove” an increase in biodiversity after that land has been concreted over is just words.	
(Policy CC4) All major developments will be expected to use Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it can be demonstrated that all types of SuDS are inappropriate...To conserve and enhance the Boroughs water resources ...	This comment is an extract from Local Plan policy CC4. No change to SPD proposed.
Section 3.1 refers to the existing local plan policies, yet as already stated it is not clear as to which policies are being given additional information and guidance to help developers comply with them. Policy SD1 on the Presumption in favour of Sustainable Development highlights the approach taken in the NPPF. We would ask that the SPD is clearer on which part of the SPD relates to Policy SD1. Policy CC1 on Climate Change sets out ways in which development can help to reduce climate change. Clearly the SPD includes a section on the types of construction that could be used to assist this. However, clarity is required to clearly show what part of the SPD relates to this policy and how.	In our opinion it is clear which policies the SPD supplements and we have avoided going into further detail to avoid the document becoming excessively long.
The webinars taking place at the end of 2021 showed that this can be tricky to implement, with mixed results. There is plenty of evidence that efficient use of even conventional gas heating can be difficult for some users. Much more discipline will be required of users of green alternatives. Queries what will be done to ensure that any changes actually result in reduced energy use without user issues.	The manufacturers of technology and retailers have a responsibility to consumers to ensure that consumers understand how to operate modern technology. Many technologies are being simplified by the use of apps, which show consumption. Like when purchasing anything else, the consumer can also play their part in understanding the technology and there are lots of organisations and campaigners out there such as the Energy Saving Trust, Ofgem and Help for householders which gives advice to consumers on how to use their technology and reduce energy usage. Comments noted no change to SPD proposed.
Queries what proportion of the housing stock will be low energy rated by 2045 and in what number of social housing and private housing will low energy modification not be feasible?	Comments noted no change to SPD proposed.
Asks what assumption is being made on the decarbonisation of the grid by the 2030 and 2045 milestones? It is understood that there will still be a	Assumptions have been made based on information and ambitions published by Central Government. The British Energy Security Strategy provides a clear, long-term plan to accelerate the

large gas consumption in power generation in 2050.	transition from fossil fuels and the local authority uses this information to inform assumptions. Comments noted no change to SPD proposed.
There is growing criticism of categorising biofuels as “green”. What impact would prohibition have on current and planned use?	Comments noted no change to SPD proposed.
Quotes an article on electricity production: “The Climate Change Committee, which advises the UK government on decarbonisation, says that an astonishing 62 per cent of emissions reductions should come not from new carbon-free energy infrastructure or production processes, but from ‘behaviour change and individual choices’. Considers this is a euphemism for using less energy, which in turn means producing less, consuming less, travelling less and enjoying a lower standard of living.”	Comments noted no change to SPD proposed.
Queries how this scenario fits in with Local Plan development ambitions. Gives an example of a site that has reached contractor appointment stage, so costs can be ascertained. Queries what is the cost impact of this design compared to conventional construction and the minimum requirements specified in the consultation document?	This answer can only be ascertained by obtaining detailed quotes for work, however there are useful sites such as the Renewable Energy Hub UK that tackle this subject in further detail. New standards can help customers to ease the cost of living and this is an attractive selling point. Research carried out by the Home Builders Federation has shown that being ‘eco-friendly’ and having a good Energy Performance Certificate were rather as the second and third most important factors, nearly a quarter of respondents stated that they are worried about the energy performance of their current home and many others reported that energy efficiently would be a crucial factor in their next home move. By building more sustainable homes, developers are helping to reduce carbon emissions and supporting their customers to reduce the consumption and impact of the growing cost of living due to increased utility prices. Comments noted no change to SPD proposed.
WCD-version-06272215121.pdf (clintel.org) Considers that time, effort and money is being spent on "How?" queries whether "Why" should be considered first.	We consider the ‘why’ has been scientifically proven. No change to SPD proposed.

Considers the overall aims of the ‘Sustainable Construction and Climate Change Adaptation’ should be applauded. Would welcome further communication to give their experience of similar SPDs and policies being consulted upon by Councils across the Country and the positives and pitfalls of points raised in the consultation draft SPD.	Comments noted.
Section 4 of the new SPD relates to ‘Whole Life Carbon’ however there is no reference within the section as to what existing adopted policy this section of the SPD is building upon or providing further advice or guidance on. Instead, the SPD tries to insert a new requirement that ‘A whole life carbon assessment will be required for all major developments.’ Looking at the referenced policies within the SPD that the document is supposed to supplement, none of these make any reference to whole life carbon assessments, or even any reference to carbon and development. As such the SPD is introducing a whole new assessment level beyond existing policy requirements whilst further adding to the workload of overstretched council officers assessing applications. Furthermore, whole life carbon assessments are costly endeavours and will result in significant financial disruption for most developers, from changing supply chains to construction methods, and for smaller developers, paying for the individual assessments. This is in direct conflict with the NPPG regarding finances and creating new policy requirements.	The Whole Life Carbon assessment requirement is not considered onerous as the Council is requesting a copy of the assessment that should be being carried out by RICS members, therefore no further costs should be incurred. We consider this issue is linked to sustainable construction and therefore Local Plan policy CC2 on sustainable construction provides the necessary hook.

Section 4. Whole Life Carbon Supports the provision to encourage assessment of carbon emissions on a 'whole life' basis for new developments and agrees that the RICS 'Whole life carbon assessment for the built environment' (November 2017) document currently provides the appropriate guidance for this. However, given this document is now more than five years old suggests that the SPD should be worded to include reference to any subsequent version of this document or other appropriate best-practice document that may supersede this document in due course. On the basis that 'whole life carbon assessments' may be undertaken by suitably qualified professionals (including and excluding members of RICS) it is suggested that the reference to RICS members is omitted i.e. to avoid potential confusion of who the model/guidance is applicable to. Alternative wording for paragraph 4.2 is therefore suggested as follows: *"…The whole life carbon assessment will be expected to follow the model set out in the RICS professional statement 'Whole Life Carbon Assessment for the Built Environment, 2017' or, if applicable, the latest subsequent version of this document or other recognised document setting out best practice for whole life carbon assessment. ", which RICS members must act in accordance with.* We note that whilst the SPD requires an assessment to be undertaken for all major developments (which the Local Validation Requirements document requires to be submitted with a planning application), it does not provide any indication of how the Council may respond to the content of any submitted assessment (i.e. in consideration of the planning application) or how the applicant should utilise the information therein to steer and document decisions made in the design and development process. Considers that the inclusion of further guidance in this respect is likely to be beneficial.	Amend paragraph 4.2 to read: 4.2 A whole life carbon assessment will be required for all major developments (10 dwellings or above and 1000m2 or above for commercial developments or change of use developments). The whole life carbon assessment will be expected to follow the model set out in the RICS professional statement 'Whole Life Carbon Assessment for the Built Environment, 2017 *or, if applicable, the latest subsequent version of this document or other recognised document setting out best practice for whole life carbon assessment.* ", which RICS members must act in accordance with. https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessmentfor-the--built-environment-november-2017.pdf The professional statement mandates a whole life approach to reducing carbon emissions and sets out specific mandatory principles and supporting guidance for the interpretation and implementation of European standard EN 15978 methodology, which is the European standard that specifies the calculation method, based on life cycle assessment and other quantified environmental information, to assess the environmental performance of a building, and gives the means for the reporting and communication of the outcome of the assessment.
Queries that section 4.2 says that all major development must provide a WLCA, yet how can a complete assessment be done for outline planning applications? Sets out issues of concern relating to timing of and data associated with producing Whole Life Carbon Assessments.	We consider this linked to policy CC2 Sustainable Construction. We are asking for submission of a RICS Whole Life Carbon Assessment. Comments noted. Text of paragraph 4.2 to be further amended as follows: A whole life carbon assessment will be required ~~for all~~ with full or hybrid applications or assessment of approval of reserved matters for major developments (10 dwellings or above and 1000m^2 or

• timing of when these are produced, if they are to be meaningful, at planning application stage or through condition? Advised to talk to development industry regarding timing , particularly in light of part Z
• issues surrounding data, to be able to do a proper Whole Life Carbon Assessment (WLCA) eg manufacturers are still lacking in creating and verifying their data for Environmental Product Declarations (EPDs).
• Lack of Bill of Quantities (BoQs)
• Reasons why in the UK we do not have enough of what is needed to carry out WLC assessments:
  ○ a. EPDs taking around 3 years to be created and verified.
  ○ b. The manufacturer hasn't calculated the Life Cycle Assessment (LCAs) of their product/doesn't have any carbon data.
  ○ c. There is no mandatory requirement for construction products to generate EPDs.
	above for commercial developments or change of use developments). Where we receive an outline application, if minded to approve, a condition will be added requiring submission of a Whole life carbon assessment alongside the reserved matters. The whole life carbon assessment will be expected to follow the model set out in the RICS professional statement 'Whole Life Carbon Assessment for the Built Environment, 2017", or, if applicable, the latest subsequent version of this document or other recognised document setting out best practice for whole life carbon assessment. which RICS members must act in accordance with. https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the--built-environment-november-2017.pdf

Section 5. BREEAM Certification for Non-Residential Buildings Supports the stated requirement for all non-residential buildings to achieve a minimum BREEAM standard of 'very good' (consistent with Local Plan Policy CC2) and the encouragement to achieve higher standards where possible. Signposts an error in paragraph 5.2, which states 'non-residential *dwellings*', but should presumably state 'non-residential *buildings*'.	Correct sentence to read Local Plan Policy CC2 Sustainable Construction ~~requires~~ expects all non-residential ~~dwellings~~ development to ~~be developed to~~ achieve a minimum BREEAM standard of 'very good'.
Section 6 Future Homes Standard The SPD states that the Council expect new development to adhere to Building Regulation Standards, both current and proposed future amendments, as a minimum. It goes on to state that the Council welcome and encourage higher standards where possible. Considers that the use of national standards and the use of the building regulations as a way to measure these standards is appropriate, and the potential for developers to go above these if they so wish to. However, this encouragement should not be taken as a requirement.	Comments noted. No change proposed.
(6.1) [New homes] will need to be zero carbon ready with no retrofit work required to benefit from the decarbonisation of the electricity grid and the electrification of heating. The intention is to future proof new homes for low	Comments noted no change to SPD proposed.

carbon heating systems and meet higher standards of energy efficiency.	
Considers Section 6 'Future Homes Standards' unclear what policy this section is supposed to build upon or providing further advice and guidance on. Paragraph 6.1 does not clarify what the 'current standard' is which new development is supposed to be 75-80% lower on CO2 emissions. Equally the document is unclear if the 'current standard' is to be the standard as of 6th January 2023, or if it will be the standard at the point of submission of an application, point of determination, or the point of adoption of the SPD. Irrespective of the date, any will have significant consequences for the design of any dwelling and the viability of any development conflicting with the NPPG on increasing financial burdens on development from substantially reducing emissions beyond what could be current standards. 6.4 is unclear, SPD states development will have to adhere to proposed future amendments of Building Regulations, however future regulations will not be known until adopted. This further confuses development and as building regulations is adhered to, the requirement appears superfluous. SPD states 'all development' must adhere to Building Regulations as a minimum, yet there is an exception for Listed and Historic Buildings, queries whether SPD seeks to countermand the Planning (Listed Buildings and Conservation Areas) Act 1990. Considers that Section 6 conflicts with both the NPPG and other legislation, whilst increasing financial burdens on development and creating new policy requirements beyond what is within existing adopted local plan policies.	Future Homes Standard is a requirement from 2025 for all homes to be built to higher standards than current building regulations, therefore the building regulations in force at the time of consultation including any relevant interim changes that came in June 2022. The sentence is intended to mean that whatever point in time the SPD is being read, the current building regulations in force at that time must be adhered to, and that higher standards than those Building Regulations would be welcomed and encouraged. This sentence is phrased in this way to be clear that Building Regulations will be updated during the life of the SPD, and development does not have to adhere to Building Regulations that were in force at the time the SPD was adopted. Change paragraph 6.4 to read "We expect new development to adhere to relevant Building Regulations Standards (and any future updates of these), as a minimum. We welcome and encourage higher standards where possible." The SPD is not seeking to 'countermand' the Planning (Listed Buildings and Conservation Areas) Act 1990. The Building Regulations relevant to the particular type of development will be applied. 'Relevant' has been added to paragraph 6.4 to cover this point.
i(6.1) The Government has brought in the Future Homes Standard, which from 2025 will require CO2 emissions produced by new homes to be 75-80% lower than homes that are built to current standards. Homes will need to be zero carbon ready with no retrofit work required to benefit from the	Zero 45 – plans to help existing stock be retro fitted. Comments noted no change to SPD proposed.

decarbonisation of the electricity grid and the electrification of heating. Queries whether low energy modification is feasible.	
Section 6.3 is the most fundamental and most important part of the SPD. It states that *"The existing Building Regulations and future revisions are a crucial element in achieving zero carbon development. The planning guidance set out in this document is intended to complement the relevant existing and future building regulations."* Building regulations is crucial in carbon reduction and is constantly being updated. It provides a national platform for all developers, to not only help provide consistency and clarity for all, but Government seek to ensure that what is being asked for is deliverable and at the time of asking, by consulting and talking to the industry prior to both consultation and the introduction of new material. Forthcoming future building regulations are subject to change and refinement through the passage of time. Therefore, from a timing perspective it is difficult to understand how a local plan prepared (including whole plan viability assessment) in the years up to 2019, has policies which align with future building regulations in 2025 and beyond. Especially as the proposed changes and uplift to Part L for 2025 are yet to be confirmed and therefore the detail is yet to be finalised. Thirdly, if the SPD is intended to complement both existing and future building regulations, it does pose the question as to what purpose does the SPD actually serve?	In developing the SPD we have aimed to take a holistic approach to include some text that we consider helpful. We felt it would have have been remiss of us in a Sustainable Construction and Climate Change adaptation SPD to not demonstrate cognisance of Future Homes and Future Buildings standards. It is not unreasonable to say that we would welcome proposals that include higher standards than those currently required by Building Regulations. Some developers may be interested in going beyond the minimum required by Building Regulations, if creating exemplar eco homes for example. No change proposed.

Section 7. Energy Efficiency and Adaptation Supports the inclusion and explanation of the 'energy hierarchy' in the draft SPD as this is an approach to building design and specification recognised and followed by the respondent where applicable. Notes that the SPD does not provide any instruction or guidance to an applicant for planning permission in relation to what may be expected or required to be submitted with a planning application, and how the Council may respond to this in the consideration of an application. If it is a requirement of the Council that planning applications include a description/account of how the energy hierarchy has been considered in the design and specification of a proposed building then this should be stated. It is noted that the Local Validation Requirements document includes for this within the 'guidance and details' for an Energy/Sustainability Statement. It is suggested that some of this content should be copied to section 7 of the SPD for clarity.	Comments noted. Include the following text as a new paragraph 7.6 to cross reference to the Local Validation Requirements. An Energy/Sustainability Statement should demonstrate how the proposed development would minimise resource and energy consumption. The detail that should be provided in this statement is set out in the Local Validation Requirements. Link to be provided when updated version on website and available.
(7.3) The zero-energy goal is becoming more practical as the costs of alternative energy technologies decrease and the costs of traditional fossil fuels increase. This statement suggests it's just a matter of price comparison, without recognising the unreliability of renewables, which will require continued use of gas and possibly coal for the foreseeable future. Adding in the cost of enabling the use of renewables makes those sources expensive, not cheap	Comments noted no change to SPD proposed.
Section 8. Sustainable Materials Supports the inclusion of the summary of criteria relevant to selecting sustainable materials as set out at paragraph 8.1. These criteria should be applicable in principle to the consideration of materials for any type or use of building. Concerned by the statement at paragraph 8.2 that the criteria *'strongly point to the use of local natural materials being the best option'* (specifically including those listed) without any contextual reference to the nature and use of the building. For instance, none of the materials listed	Comments noted At the beginning of paragraph 8.3 add 'Where appropriate' Use of these natural materials is to be preferred where appropriate, subject to detailed specification, sustainable sourcing, context and appropriate design.

could be applicable to the construction of a modern warehouse or industrial building. Whilst no objection to the Council's preference for use of these listed natural materials on appropriate building types, it is questioned whether there is adequate evidence to support the assertions that the criteria (paragraph 8.1) *'strongly point toward local natural materials being the best options'* and for the items specifically included within the list. For the SPD to be of greater assistance in this respect, it should be revised to provide qualification of the materials list as to the circumstances in which they may (or may not) be applicable. Consideration should also be given to whether these materials are compatible with modern methods of construction and energy efficiency solutions.	
Section 8 on Sustainable Materials is clearly one way in which carbon reduction can be achieved, albeit this is something we are already looking at. Each site is different and it is not only the cost that is an important factor but access, topography, ground conditions and availability too, meaning that materials always have to be considered on a site by site basis. We have acquired a timber frame company and where it is feasible to do so, we do use timber frame construction. We are also testing new technology and new ways of constructing new homes for the future, via our Z House and Energy 2 House on the University of Salford campus. We note that section 8.3 seeks a preference for the use of natural materials, but that use is dependent on a number of factors.	Comments noted.

At Section 8.4 it says that "*the Council strongly recommends that material should be specified from suppliers who participate in an applicable responsible sourcing scheme such as the BRE BES 6001:2008 Responsible Sourcing Standard"* What dialogue and research has the Council undertaken with the development industry including trades and suppliers to see whether this is both achievable and feasible?	We are adopting the RICS best practice. This will be underpinned by research. This consultation process afforded consultees the opportunity to give us their views on whether this is achievable and feasible. No change proposed.
Section 8.5 reiterates what most developers do already in terms of considering material selection early in the process to ensure proposals are buildable and affordable. However, given the considerable passage of time over a number of years starting with 1) the early stages of design consideration through to 2) pre-application discussions 3) determination of a planning application 4) discharge of conditions 5) starting on site, a lot of things can change, some of which are outside of a developers control.	Comments noted. No change proposed.
Section 9 is long and does not support or provide any policy context but instead describes and explains what several features of MMC are and sustainable technologies that development can incorporate. Paragraph 9.9 adds an onerous requirement on potential future developments. The paragraph states that all new roofs of 25m2 with a flat or pitch of less than 25 degrees should be a living roof, which would add financial burden for development. Similarly, living walls, although attractive, are costly endeavours to install and have significant maintenance issues for the average homeowner. As such, the viability, both financially and physically for their longer-term retention should be considered and acknowledged by the Council. Typo with "41 | P a g e" in the text of paragraph 9.11.	We consider the section on modern methods of construction to be helpful. Typo in paragraph 9.11 corrected.
(9.16) Biomass systems burn wood, plants or other organic matter in the form of pellets, chips, logs etc. to provide warmth in a single room or to power central heating and hot water boilers. It is considered a renewable energy and low carbon option, ….	This comment is simply an extract from the SPD with no additional comment. No change to SPD proposed.
Paragraph 9.22 is unclear regarding the bullet points. The SPD should be	Under the district heating heading this para states:

clear if the points are connected to development providing district heating proposals or development in general. If the latter, these points, specifically point 2 would create a challenging burden with financial implications for development, again in breach of the NPPG.	9.22 Examples of heat networks include a facility that provides a dedicated supply to the heat network, such as a combined heat and power plant; or heat recovered from industry (such as disused minewater), canals and rivers, or energy from waste plants. • New development should minimise energy efficiency and space heating requirements, irrespective of district heat network connection • Development should make all reasonable efforts to meet net zero onsite emissions prior to connection to any district heat network • Where net zero cannot be met onsite, exemptions for district heat networks will be considered where there is a clear and demonstrable net zero transition plan to 2030. First bullet relates to all, the 2nd and 3rd bullets relate to where District Heating is being implemented Suggested response: Bullet points 2 and 3 relate to proposals where a district heat network is being installed. Negotiations can take place on individual applications if viability is proven to be an issue.
Section 9. Modern Methods of Construction Supports the inclusion of modern methods of construction within the SPD and agrees with the recognition (at paragraphs 9.2/9.3) that the benefits of off-site and modular construction need to be balanced against the potential disadvantages. Whilst the SPD does not state or imply that modern methods of construction are expected to be employed, it is considered to be useful in discussing the broad options available. In the interest of reflecting gender equality, it is suggested that the term 'tradesman' in paragraph 9.3 is replaced by 'tradespeople'.	Comments noted. Paragraph 9.3 to be amended to read: …..Potential issues include (significant) restrictions on design options, fixing the design earlier in the process, taking work away from local ~~tradesman~~ tradespeople and reducing the future adaptability of buildings.
Supports the inclusion of the explanatory text relating to a range of potential building installation and technologies able to enhance sustainability including energy generation and efficiency. Again, it is noted	Amend paragraph 9.9 to read: 9.9 The Council considers that the following should apply to all new

that the SPD does not state that the inclusion of any given installation or technology is required or expected to be provided, which is appropriate as the differences between development types and locations etc. will influence whether any particular installation or technology is suitable. Flexibility may be required to achieve an optimised solution and compatibility between different installations and technologies, for instance the installation of rooftop solar PV panels and/or a green roof. Concerned that the statement at paragraph 9.9 bullet point 1 which essentially says that *'the Council considers that all flat or shallow sloping roofs of more than 25 sqm should be a living roof unless conflicting with the provision of solar panels'*. This is considered to be too general a requirement which does not recognise or allow consideration of potential constraints to this. The wording should therefore be revised to allow flexibility in the consideration of this, as follows: *'The Council considers that the following should apply to all new developments:* *• All Living roofs of a suitable type and design should be considered on all new roofs of more than 25 sqm, which are flat or have a pitch of less than 25 degrees, should be a suitable type and design of living roof, unless conflicting with openings to provide natural light, the rooftop provision of solar panels or other aspects of the building's construction, operation or viability; and* *• Living walls should be considered as a possible option on buildings, though especially if needed to help mitigate visual impact on otherwise blank and/or architecturally unrelieved facades*	developments. : • Living roofs of a suitable type and design should be considered on all new roofs of more than 25m2 , which are flat or have a pitch of less than 25 degrees, ~~should be a suitable type and design of living roof~~, unless conflicting with openings to provide natural light and the rooftop provision of solar panels; and • living walls should be considered as a possible option on buildings, though especially if needed to help mitigate visual impact on otherwise unacceptably blank and/or architecturally unrelieved façades. If there is conflict between provision of photovoltaics and living roofs, we will prioritise photovoltaics.
The SPD looks to encourage Passive House design in all homes where possible, and states that it is particularly encouraged in self build developments and any development within villages. Considers this encouragement should not be taken as a requirement.	Comments noted. As the SPD says 'where possible' it is not making this a requirement if not feasible. No change proposed.
Supports policies that drive up standards for sustainable construction. Encourages rainwater capture and reuse policies, particularly at development scale for development types where this will reduce GHG emissions and support water resources. Notes the importance of integrating green and blue infrastructure, including SuDS, to address climate impacts. Benefits from this infrastructure include	Comments noted.

reducing the need for both cooling and heating of buildings, and in turn associated GHG emissions. Tree planting1, green walls2 and roofs should be encouraged. These provide multi-functional benefits including carbon sequestration, reducing exposure to poor air quality, wellbeing and biodiversity gains, flood resilience, and shading and cooling of buildings. 1 Tree planting needs careful consideration, ensuring that the right trees (and plants) are planted in the right places to ameliorate exposure to poor air quality and take account of future climate change. 2 Green walls need long term maintenance and a sustainable water source. Renewable energy is an important part of the solution to reducing GHG emissions and meeting future energy needs. Through permitting and regulating sites, and by assessing our evidence of how technologies might affect the local environment, we can advise on proposed policies/schemes. Our Environmental Principles for the Energy Sector should be considered within the context of renewables, see below under additional information. Supportive of technologies and approaches that: • consider environmental risks early and comprehensively; • minimise the impacts and risks to people and our environment – air, land and water; and, • are fit for the future, including resilience to the impacts of climate change. Focus is on ensuring schemes comply with statutory standards for environmental quality, species and habitat protection. Investment needs to be future proofed and to recognise the constraints of the natural environment as it is impacted by the changing climate. When developing policy relating to heat networks, recommends that consideration is given to the policy section within the DEFRA Energy from waste: A guide to the debate document. This outlines four key principles underpinning current thinking on Energy from Waste. Particularly notes the importance of maintaining the waste hierarchy and the precedence to reduce or mitigate the environmental impacts of waste management. This should be reflected in the SPD text.	Add text to reflect this document although from 2014 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf

(10.3) All development should be designed to minimise the consumption of water and should make adequate and appropriate provision for water recycling. Queries whether to reduce the size and cost of SuDS systems, new dwellings should be fitted with grey water storage, which would reduce stress in dry periods as well as reducing the capacity requirements of estate-wide SuDS systems. Queries whether this would result in maintenance and/or hygiene issues.	Comments noted no change to SPD proposed.
The SPD states that all development should be designed to minimise the consumption of water and should make adequate and appropriate provision for water recycling. It also states that a condition on all planning permissions for the development of new residential development will be imposed to trigger the optional requirement under Part G of the Building Regulations 2010. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. As set out in the NPPF[1], all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG[2] states that where there is a *'clear local need, Local*	Comment noted, requirement to be deleted.

[1] Paragraph 31
[2] ID: 56-014-20150327

Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'. PPG[3] also states the *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'*. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. Yorkshire Water and Barnsley are not considered to be an area of Water Stress as identified by the Environment Agency[4]. Considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.	
Whole Life Carbon / BREEAM / Future Homes Standard / Sustainable Materials / Energy Efficiency and Adaptation Supports policies that drive up standards for sustainable construction. Supports policies aimed at improved efficiency and compliance by regulated facilities and decreased emissions from non-regulated facilities. Welcomes the inclusion of reference to the BREEAM standards. Encourages to consider setting out requirements for development that look to establish non-residential development BREEAM excellent standard as a minimum where they are in areas of serious water stress, or where other evidence justifies a tighter water efficiency requirement. LPAs can set higher energy performance standards than Building Regulations in their Local Plan documents, under specific conditions, see link for further information.	Comments noted. The SPD is only able to welcome and encourage higher standards than policies in the adopted Local Plan, unless they are requirements under other regulations such as Building Regulations.
Wishes to see an early consideration of the water supply and sewerage infrastructure required to support climate resilient growth. For example, through evidence/commitment of water companies to ensure adequate supply, water efficiency and treatment, conveyance and environmental disposal capacity is planned for and available. There should be an assumption against the proliferation of private sewage treatment systems	Comments noted.

[3] ID: 56-015-20150327
[4] 2021 Assessment of Water Stress Areas Update: https://www.gov.uk/government/publications/water-stressed-areas-2021-classification

and private water supplies. Strongly encourage LPAs to set out water policies that reflect the requirements of River Basin Management Plans and Water Framework Directive (WFD) as you do. The WFD needs to be considered throughout the Development of a Local Plan, including through this SPD. Catchment and River Basin Management Plans water quality priorities should also be reflected in strategic planning documents. NPPF paragraph 174 (e) promotes the use of the RBMPs to enhance the environment. LPAs have an important role in implementing the WFD, making sure new development does not cause deterioration and whenever possible supports measures to improve water bodies. Nature Based Solutions (see further info below) can help deliver improvements to water quality and subsequently WFD objectives. Greater referenced to these aspects could be included within this SPD.	

Drainage and Flood Risk As articulated within the FCERM Strategy, wants to ensure that resilience to climate change is embedded in all new development, so that today's places and infrastructure are resilient to tomorrow's climate. Water company drainage and wastewater management plans account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act has made these plans statutory, collaborative and should integrate into long term planning documents, such as this.	**Comments noted.**
Sustainable Drainage Systems (SuDs) should always be carefully considered in discussions with the lead local flood authority. However, any drainage system must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination. We welcome acknowledgement of this within the SPD. Supports Local Plan documents and policies that encourage the use of multifunctional SuDS, including on smaller-scale developments. We encourage statements and policies which set out the locations of where types of SuDS will and will not be appropriate, to maximise their benefits and minimise risks. We also advise that the longer-term maintenance of SuDS and the associated carbon and climate change impacts needs to be considered through planning proposals and decisions. These elements could be incorporated into the SPD to further enhance it and the delivery of SuDS within Barnsley. SuDS can help address climate change by reducing flood risk, ameliorating urban heating, enhancing biodiversity and relieving pressures on water resources. SuDS also have a lower embodied carbon than conventional drainage systems and can sequester carbon throughout their lives.	**Comments noted.**
Recycling/Waste Provision Local Plan documents should promote approaches that support the transition to a more Circular Economy (CE) and the Waste Hierarchy (WH). This can be achieved through the promotion of waste reduction, reuse and recycling in an integrated way. In considering these aspects, plans should be working towards reductions in energy use and conservation of resources. The key drivers are the Government's 25 Year Environment Plan, which includes the Resources and Waste Strategy (R&WS) and CE Package - The Waste (Circular Economy) (Amendment)	Comments noted.

Regulations 2020, which includes a chapter on waste planning. We encourage you to incorporate these elements within this SPD. The CCC Sixth Carbon Budget (waste Annex) includes an Energy from Waste (EfW) statement that should be considered when developing policy. This states that by 2040, EfW should be fitted with Carbon Capture Utilisation and Storage (CCUS). CCUS is a method of removing carbon dioxide from industrial emissions to the atmosphere. It is an important element within the Government's plan to decarbonise industry and is being taken forward through Industrial Clusters. It would therefore be appropriate to consider the practicalities for CCUS in relation to EfW. • Supports the following key policies including: • Policies that support separate handling and logistics, once a product has reached the end of its first use. It is important that the systems in place have • sufficient capacity to support reverse logistics (take back) for refurbishment, remanufacture and disassembly. • Policies that identify key waste streams where the biggest environmental gains can be made, prioritising action to promote the principles of circularity and the WH**.** • Encourage design standards for new housing and infrastructure, which promote the separation of products for reuse and remanufacture etc**.** We recommend that these are also aligned for reverse logistics, include community scale storage and neighbourhood facilities that promote repair, reuse and separate collection. • Encourage community and third sector involvement through the development of community networks which stimulate activity to reuse, repair etc., promoting more inclusive and resilient communities**.**	
Provides additional information on Environmental Principles for the Energy Sector and is supportive of technologies and approaches that: 1. Consider environmental risks early and comprehensively. This includes: a. Building environmental considerations into decision making at the earliest stage – not as an afterthought b. Providing robust evidence that allows the environmental risks to be effectively managed and regulated, and which considers risks of deployment at commercial scale	Comments noted.

c. Assessing all impacts from cradle-to-grave - including harvesting feedstocks & raw materials, decommissioning, and safe long-term storage of waste d. Engaging the public so they understand the risks and benefits 2. Minimise the impacts and risks to people and our environment – air, land and water. This includes: a. Maximising decarbonisation and greenhouse gas reduction within safe environmental limits b. Maximising resource, energy and water efficiency – wasted resources, energy and water represent harm without benefits c. Maximising co-benefits for people and the environment 3. Are fit for the future, including resilience to the impacts of climate change.	
National Net Zero Targets The UK has set out in law the target of achieving Net Zero by 2050. The Climate Change Act (2008) states that 'it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline.' To achieve this, the annual rate of GHG emissions will need to be cut by over 260 million tonnes (Mt) CO2e (carbon dioxide equivalent) from 2019 levels to less than 90 Mt CO2e in 2050 (CCC, 2019a). There is a statutory duty on LPAs to include policies in their Local Plans designed to tackle climate change and its impacts. In particular, Section 19 of the Planning and Compulsory Purchase Act 2004 states that 'Local development plans must include policies designed to secure that the development of and use of land contribute to mitigation of and adaptation to climate change'. Revisions to the NPPF in 2021 include a requirement to promote a sustainable pattern of development, by mitigating climate change and adapting to its effects (para 11a). The NPPF also states (para 134) that enhanced local policies and government guidance on design should be given 'significant weight'. The Environmental Assessment of Plans and Programmes Regulations 2004 creates a legal duty and require that a plan's cumulative climate impacts are assessed and taken into account. This includes assessing the consistency of proposed policies with all relevant climate objectives and targets.	Comments noted. The Local Plan does contain climate change related policies, that are the policy basis for this SPD.

Nature Based Solutions Considers that a policy should incorporate a requirement for nature-based solutions (NbS) for development. This is to ensure the protection and enhancement of nature. This includes an increased uptake and connectivity of green/blue infrastructure. NbS can provide natural carbon sinks, help deliver improvements to water quality and resilience against climate impacts, including flooding and overheating. We consider that policy could be enhanced with the inclusion of the following: *Development will be required to incorporate Nature Based Solutions within their development proposals through utilising a natural capital approach.* The role of NbS is founded on the principle that where an ecosystem thrives, it provides valuable services and benefits to society. NbS provide a range of benefits in tackling climate change, including by: • expanding natural carbon sinks such as forests, peat bogs, and coastal/terrestrial wetlands. • preventing further nature loss and providing resilience against climate impacts such as sea-level rise, flooding and extreme weather events. • protecting built assets, e.g. concrete flood defences by moderating stresses they are subject to and improve their climate resilience/longevity. • regulating erosion, sedimentation, local climates and water quality. Encourages a natural capital approach to prioritise the use of NbS within your plan. A natural capital approach – understanding that nature underpins human wealth, health, wellbeing and culture – underpins the delivery of both biodiversity and environmental net gain. By creating bigger, better and more connected natural assets, we improve the resilience and flow of ecosystem services and the benefits society receives from them. Ecosystem services are functions and products that flow from natural assets and provide benefits to people. For example, ponds, reed beds and woodlands absorb carbon and help mitigate the effects of climate change by slowing floodwater and cooling the air. Specific tools which can support a natural capital approach include: • registers and accounts that systematically quantifies the natural assets in a place, the flow of services and the value of the benefits; • metrics for ecosystem services to inform options appraisal, build better business cases for investment and support quantitative reporting of environmental gains and losses; and	We cannot create new policy through this SPD. Text to be added to encourage nature based solutions.

• identification of potential investment routes to enable delivery of climate adaptation and mitigation measures.	
Biodiversity and Environmental Net Gain Local plans should set out Biodiversity Net Gain (BNG) policy requirements, including those that help tackle climate change such as NbS (see above)**.** BNG is an approach to development which aims to leave nature in a measurably better state than beforehand. It is recognised as a powerful way to deliver wider outcomes that benefit the environment, wildlife and people. BNG offers considerable scope to help create resilience places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks. It is expected that is that Local Nature Recovery Strategies will be used to help inform how and where BNG should be delivered. Environmental Net Gain (ENG) extends beyond BNG, expanding on net gains for biodiversity to deliver wider benefits, such as improved air and water. Whilst there is no planned mandate for ENG, it should be encouraged as the approach offers additional opportunities to tackle climate change.	We have a separate Biodiversity and Geodiversity SPD.
Delivering better water management through the planning system CIRIA have released guidance for delivering better water management through the planning system. Water management is vital for good town planning. Planning for water enables towns and cities to be greener, healthier, wealthier, more attractive and more resilient to climate change. The guidance sets out that integrating water management brings multiple benefits, including: • Increased resilience • Delivering housing and strong local economy • Enhancing environment and greenspace. The guidance explains the role of effective strategies and local plan policies that should be underpinned by effective engagement and evidence. The guidance also demonstrates how the application of critical success factors, combined with good policies can deliver good water management outcomes.	Local Plan has policy CC5 on water resources

This may prove useful to you when considering water management policies, looking both water quality and resources. This guidance can be found here: https://www.ciria.org/ItemDetail?iProductCode=C787F&Category=FREEPUBS	
Further Resources There are a wide range of organisations offering support to councils seeking to adopt and implement climate change policies. The organisations and resources listed below are trusted sources of advice. ● TCPA/RTPI: The Climate Crisis: A guide for LAs on planning for Climate Change This is regarded to be a key resource to shape planning policy and contains good practice examples. ● The Local Government Association's Climate Change Hub contains a wide range of resources designed to support councils tackle climate change, including case studies and planning/housing information. ● LGA/Local Partnerships Climate Adaptation Toolkit (December 21) outlines a 5-step process to help councils prepare for climate impacts. ● The ADEPT Preparing for a Changing Climate: Good Practice Guidance for Local Government is designed to help councils prepare for climate impacts. ● Ashden provides resources to support council action on climate change. ● Carbon Trust Local climate action planning contains information and examples of Local Authorities that have NZ outcomes in their strategies. ● BS 8631: Adaptation to Climate Change – using adaptation pathways for decision making. Adaptive pathways can help to ensure that as a nation we can be more economically resilient to future climate hazards and better manage future flood and coastal risks. ● The Defra Accounting for the Effects of Climate Change provides supplementary guidance to the HMT Green Book. It is designed to support policy makers identify how their proposals can be affected by climate risks and how to design adaptation measures in response. The guidance reflects the EA's Climate Impacts Tool and some of our place based approaches for tackling climate change, e.g. the Thames Estuary 2100 plan.	Comments noted.

Notes that within the SPD harm to the character of the landscape is referred to in citing Policy RE1. However notes it does not contain reference to protection of the national park.	Policy RE1 is a Local Plan policy. Its wording cannot be changed in the SPD. No change proposed.
Points out the following typos Para 9.11 has erroneous 'Page 41' reference Para 9.23 should be 'brise-soleil'? Para 9.28 "..such as solar radiation, cool night air…."	Comments noted. Suggested amendments to be made. Para 9.11 has erroneous 'Page 41' reference Para 9.23 should be 'brise-soleil'? Para 9.28 "..such as solar radiation, cool night air…."
Apart from the odd new requirement over and above the local plan requirements, the content of Section 9 on Modern Methods of Construction is a list of different options to consider when building new homes. Some of which refers to building requirements and other which developers can consider but is not necessary in order to comply with the Barnsley local plan. We would therefore query the need for this SPD, but instead, maybe the Council could provide an informative document on the options of modern methods of construction for those who may find it beneficial. This would appear to be a more appropriate option.	In developing the SPD we have aimed to take a holistic approach to include some text that we consider helpful, in addition to setting out our requirements.
Section 9.9 requiring new development to provide living roofs and living walls. If the Council wishes to suggest this as an option than that is different, but to insist on it for all development which have a flat roof or pitch of less than 25 degrees can only be imposed via a local plan policy. Indeed the requirement for living roofs and living walls could well conflict with renewable technologies i.e. solar panels required as part of a package of measures to achieve higher building regulations standards.	We consider this requirement is reasonable and relates to policy CC2 Sustainable Construction. We propose to amend paragraph 9.9 to read: 9.9 The Council considers that the following should apply to all new developments. : • Living roofs of a suitable type and design should be considered on all new roofs of more than 25m2 , which are flat or have a pitch of less than 25 degrees, ~~should be a suitable type and design of living roof~~, unless conflicting with openings to provide natural light and the rooftop provision of solar panels; and • living walls should be considered as a possible option on buildings, though especially if needed to help mitigate visual impact on otherwise unacceptably blank and/or architecturally unrelieved façades.

	If there is conflict between provision of photovoltaics and living roofs, we will prioritise photovoltaics.
Notes that the SPD will supplement Local Plan policy CC1, which includes a commitment to reduce the causes of, and adapt to the future impacts of, climate change via the use of green infrastructure. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. GI can be designed to maximise the benefits needed for development proposals. The following case studies demonstrate how GI can be used to: • Adapt parks and surrounding area to climate change, improve flood water management, thereby protecting local homes and businesses – Mayesbrook Park • Improve flood water management, create a sense of place, reduce atmospheric pollution and enhancing biodiversity – Greening for Growth in Victoria Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web	Comments noted. No change proposed.

Youth Council 30/1/23

Sustainable Construction and Climate Change Adaptation SPD

Notes

Attendees: Paula Tweed; Stacey Chaplin; 2 Youth Voice Coordinators; 9 Youth Council representatives

PT and SC talked through the key points of the Supplementary Planning Document.

A discussion followed. Issues raised were:-

- View expressed that making development more sustainable increases costs to residents. Discussed the benefits to residents such as warmer homes, lower energy bills in the longer term.
- Considers that implementing sustainability requirements will slow the development process down.
- Kim raised the fantastic project the 4T's that the Youth Council are running. They have taken an unused site on West Road Pogmoor, and have planted fruit trees. They are turning it into a space the community can use.
- Affordable housing is needed.
- Development in Darfield in an area of flood risk. PT raised that flood risk is taken into account both in site selection for Local Plan allocations and at planning application stage.
- The unfortunate incident of a silver birch tree being removed during development at Hoyland Town Square was raised. Artificial grass was also raised. A discussion followed about artificial grass and why it isn't considered environmentally friendly.