



## **Consultation on the Dorset Council Planning for Climate Change: Sustainability Checklist.**

### **Summary of issues raised and officer responses**

December 2023

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## Introduction

Dorset Council prepared three non-statutory guidance documents on planning for climate change. A public consultation on the draft versions of the documents took place from 20 April to 8 June 2023.

The consultation on the 'Planning for Climate Change: Sustainability Checklist' document drew comments from 59 responders in the online survey, with a number of additional responses received by email. In the online survey around 160 responses to the individual questions were received. The consultation on the Sustainability Checklist drew comments from a range of responder types. These included statutory and national bodies such as Historic England, Sport England, National Highways, the Environment Agency, Wessex Water, and the Woodland Trust. Responses were also received from a range of local organisations mainly from the climate and energy sector. A broad geographical range of Town and Parish Councils responded, as did a number of developers and planning agents, and a number of members of the public. The comments received are summarised below, alongside the Council's responses to the comments.

The consultation also included proposed changes to the to paragraph 39 of the Local List. This section drew comments from 51 responders in the online survey, with a number of additional responses received by email. In the online survey around 99 responses to the individual questions were received. For this element there was a range of responder types. These included a range of local organisations mainly from the climate and energy sector and a broad geographical range of Town and Parish Councils. A number of developers and planning agents also responded, as well as a number of members of the public. The comments received are summarised in the relevant section below, alongside the Council's responses to the comments.

This document provides a summary of the issues raised, and the planning policy team's response to or comments on those issues. Where a change is proposed to the Sustainability Checklist as a result, this is highlighted in bold.

## Summary of issues raised and officer responses - Sustainability statement and checklist for planning applications

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<b>Principle of introducing a checklist</b>	
<p><u>Developers/agents</u></p> <ol style="list-style-type: none"> <li>1. Unduly onerous expectations (in relation to energy, embodied carbon and water consumption) shouldn't be placed at the earliest stages of planning</li> <li>2. Any requirements should be stepped in line with Government targets and the proposed changes to Building Regulations. Aligning requirements would be pragmatic, more achievable and would not add unnecessary financial burden to development.</li> <li>3. Promoting climate change resilience and delivering efficiencies is a national challenge. The best approach is to avoid prescription at the local level and instead support nationally prescribed standards that may be set out through planning legislation or Building Regulations. This enables consistency and certainty within the wider development industry.</li> <li>4. Creating different or additional requirements at the local level may potentially delay the build out of development sites.</li> <li>5. The proposed Sustainability Checklist cross refers to "Industry guidance, good practice and case studies" which contains details which are not stipulated in local planning policy consistently.</li> <li>6. A sustainability checklist is welcomed to provide clarity for applicants. (SWHAPC)</li> <li>7. Checklists should not be excessively lengthy and onerous.</li> <li>8. The role of the checklist is not clear and additional administrative burdens on an already strained system should be avoided, particularly where this duplicates other regulatory requirements and standards.</li> </ol> <p><u>CPRE</u></p> <ol style="list-style-type: none"> <li>9. Commend the preparation of the checklist</li> <li>10. DC does not go far enough in ambition and timescale</li> </ol> <p><u>Public response</u></p> <ol style="list-style-type: none"> <li>11. Welcomes the tightening of regulations in terms of insulation of new homes.</li> </ol>	<ol style="list-style-type: none"> <li>1. The intention of the checklist is to encourage applicants to take sustainable construction matters into consideration at an early stage. The questions and best practice measures set out are to encourage best practice and are not mandatory unless already required by policies in adopted local plans. Some amendments have been made to the section on embodied carbon as it is acknowledged that such work may not be possible or practicable at the application stage.</li> <li>2, 3. There is currently no set timeline for the introduction of the Future Homes Standards through Building Regulations, although it is expected within the next couple of years. The Interim Guidance and Position Statement evidences the need to address climate change now. The checklist is therefore intended to encourage best practice wherever practicable. Additionally, many applications being made now will have construction timelines that necessitate consideration of likely new Building Regulations standards. The checklist makes clear that the targets are not mandatory unless already required by policies in adopted local plans. The wording 'Sustainability standards for consideration' will be amended to 'Sustainability objectives for consideration.'</li> <li>3. Regarding avoiding prescription at the local level, it is becoming common practice for local authorities to set local targets in the absence of national policy or regulations and this is considered entirely appropriate<sup>1</sup>. Different options will be considered in the new Dorset Local Plan and in the meantime best practice objectives are set out in the checklist to encourage applicants to consider sustainable design and construction early on. Guidance such as the Net Zero Carbon Toolkit and the LETI Climate Emergency Design Guide helps ensure consistency of approaches.</li> <li>4. The requirement to complete a sustainability checklist is not considered to result in delays to the build out of development sites. The checklist does not set requirements, it highlights</li> </ol>

<sup>1</sup> See Essex Open Legal Advice – Energy policy and Building Regulations (Estelle Dehon KC, Cornerstone Barristers 28.04.23) [essex-open-legal-advice-energy-policy-and-building-regulations.pdf](https://www.essexdesignguide.co.uk/essex-open-legal-advice-energy-policy-and-building-regulations.pdf) (essexdesignguide.co.uk)

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p><u>Local environmental organisations</u></p> <p>12. Standards set should be more challenging than currently stated.</p>	<p>best practice objectives which should be aimed for when building sustainably. It therefore provides an opportunity to consider these issues up front rather than retrospectively.</p> <p>5. This is to signpost useful guidance, it is not expected that applicants would meet the standards/details etc set out in every guidance document.</p> <p>6. Your comments are welcomed.</p> <p>7. The checklist is not considered to be overly lengthy or onerous. It is designed to enable an applicant to more quickly identify the measures proposed to address climate change in their proposal.</p> <p>8. The role of the checklist is to encourage applicants to take sustainable construction matters into consideration at an early stage and for decision makers to be able to clearly see what has/hasn't been taken into consideration or incorporated and why. The checklist is a consistent way for applicants to provide the information needed for the sustainability statement (which is required by paragraph 39 of the Local List).</p> <p>9. Your comments are welcomed.</p> <p>10,12. The approach taken is considered to be most that can be done in the current timescale prior to adoption of a new local plan, and in the context of current and changing national planning policy.</p> <p>11. Further changes to Building Regulations through the Future Homes Standards are expected but the specific timeline is unknown.</p>
<p><b>When the checklist is required</b></p>	
<p><u>Developers/agents</u></p> <p>13. Permission in Principle, Prior Notification and Outline planning applications should be explicitly stated as "exempt".</p> <p>14. Checklist must be considered reasonably in respect of outline planning applications where matters of detailed building design may not be known at the time of the application.</p> <p>15. Applicants should not be forced to undertake technical work which does not go to the principle of development on a site or location.</p> <p>16. A standard condition or informative could be attached to any subsequent approval, Outline or Full, seeking demonstration of the requirements of the sustainability checklist rather than front loading the detailed information required at application stage thus significantly reducing the applicants cost of making a planning application.</p> <p>17. Suggestion that most applicants won't be able to complete this long list as there are limitations which can't be overcome as the checklist doesn't allow for any existing buildings only new ones.</p> <p>18. Listed buildings are virtually exempt from some areas altogether - conservation of fuel Part L and double glazed windows for example.</p> <p>19. Following the review of this document in full it is concluded that minerals developments are outside of the scope of the Sustainability Checklist.</p> <p>20. Concerns regarding the utility and effectiveness of the proposed sustainability checklist as a tool for guiding planning decisions and securing high standards of sustainable design and construction.</p> <p>21. Suggestion to look into the RIBA Plan of Works, and the stages of development there - it is obviously unhelpful to ask for specifics in stage 3 that can only be determined in stage 4 onwards.</p> <p><u>Parish and Town Councils</u></p> <p>22. All types of development, regardless of size, type or purpose should be subject to a sustainability checklist.</p> <p>23. The Planning Authority should be assessing the sustainability of developments and how climate change is being addressed within a development, whether it's a one-off or a number of properties. This would then take the burden off the natural grid which cannot sustain further connections.</p>	<p><b>13/14/15/16/21. Permission in principle and prior notification applications will be exempt and the wording will be amended to make this clear. Outline applications will not be exempt, but it is acknowledged that some of the information will not be available at this stage. The level of information will be proportionate and relevant relative to the nature and scale of the proposal, and the application type. An amendment will be made to clarify this.</b></p> <p>17. The checklist details that where an applicant cannot meet a best practice objective, they should explain the reasoning.</p> <p>18. The checklist will not apply to applications for listed building consent.</p> <p>19. The checklist will not apply to minerals development, which is subject to the Minerals Strategy 2014, including Policy CC1 – Climate Change.</p> <p>20. Noted. High standards can only be secured by new policy, and different options will be considered through the new Dorset Local Plan. However the aim of the checklist is to encourage applicants to consider working towards best practice in energy efficiency and other areas.</p> <p>21. The RIBA plan of work is acknowledged however there is considered to be a need address and consider the issue of climate change up front, as far as is practicable, in the context of the climate emergency.</p> <p><b>22/24/25/26.</b> The checklist will cover most planning applications where new buildings or changes of use are proposed, as well as where there are significant extensions with regards to non-residential. Due to the varying scale of householder applications (many being of very limited scope), it is felt it would be too onerous to require a checklist for this application type. It would also be unreasonable to require information regarding net zero credentials for a site which aren't related to the work being proposed.</p> <p>23. This is partly what the sustainability checklist is aiming to achieve.</p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>24. Further consideration of extensions is needed - 10% of a 20 bedroom manor house or a factory is very different to 10% of a 3 bed semi. It is our considered view that there should be no exceptions.</p> <p><u>Parish and Town Councils, Local community organisations</u></p> <p>25. The checklist should be expanded to cover improvements to existing housing stock, given that very many planning applications are concerned with alterations to existing properties – including householder applications.</p> <p><u>Local community organisations</u></p> <p>26. Page 6. para.2 Re householder applications - "Applicants may wish to note if a proposed development is net zero ready" – seems weak in the context of 27m homes nationally that still need to be retrofitted and have renewable energy generation added.</p> <p><u>Businesses</u></p> <p>27. In many cases planning applications may represent an inherently minimised carbon output compared to alternatives.</p>	<p>27. Noted.</p>
<p><b>Status of the checklist</b></p>	
<p><u>Public response</u></p> <p>28. The checklist should be mandatory.</p> <p>29. Planning conditions should be used to enforce standards.</p> <p><u>Developers/agents</u></p> <p>30. There will be applications which simply cannot comply with many of the items on the checklist - In most instances questions will receive the answer 'we don't know yet' so are completely redundant and unhelpful.</p> <p>31. The Sustainability Checklist needs to be clear which standards are mandatory and which are aspirational/supplemental.</p> <p>32. The relevance of the LETI guidance to development in Dorset needs further consideration before this is included in the checklist.</p> <p><u>CPRE</u></p> <p>33. The standards should be mandated and be more challenging. Mitigating climate change should carry more weight in planning decisions than currently.</p> <p>34. There is a reluctance to bring in any tighter controls earlier than Government legislation. Introduction of improved standards should be accelerated as other LPAs have chosen to do.</p> <p><u>Local environmental organisations</u></p> <p>35. All checklist items should be mandatory.</p> <p>36. Certain checklist standards should be mandatory.</p> <p>37. Concern that this isn't a tick box exercise, where applicants can fore fill the lowest possible criteria. It needs to be reaching to high standards.</p> <p>38. Need to set higher emissions standards for buildings than are required nationally as Local Planning Authorities already have the power to do.</p> <p><u>Parish and Town Councils</u></p> <p>39. The sustainability checklist should be compulsory with few exceptions and the standards that are referred to should be mandated and be more challenging than currently stated.</p> <p>40. The design codes included within local Neighbourhood Plans should be adopted as part of the Dorset Local Plan and cross-checked by the Planning Authority when considering and granting planning permission.</p> <p><u>Dorset Council Cllrs</u></p> <p>41. If the checklist/standards remain only as guidance, they must not influence planning decisions. Allowing applicants to offer to adhere to non-enforceable guidelines would seriously undermine the planning system.</p>	<p>28. It will be mandatory to complete a checklist for most application types where it is deemed reasonable, as set out in the amended paragraph 39 of the Local List. However the standards set out are best practice and are it will not be mandatory to achieve them unless they are already required by policies in adopted local plans.</p> <p><b>29/35/36/37/39/41/43.</b> It may be possible to use planning conditions to enforce standards and make them mandatory where they are required by adopted planning policy. However where they are not, the use of a condition is not deemed justified or necessary and therefore it would be unreasonable to do so.</p> <p>30. The checklist details that where an applicant cannot meet a best practice objective, they should explain the reasoning.</p> <p><b>31. Further wording will be added to the supporting text to set out where an adopted policy requires a proposal to meet a certain standard.</b></p> <p>32. The relevance of the LETI guidance to Dorset Council has been considered. The approaches within it are consistent with approaches now formalised in adopted policy for other Councils in the South-West. The Council will undertake further evidence gathering when working towards adopting policy through the Dorset Local Plan.</p> <p><b>33/38.</b> The Council will consider different options relating to improved standards through the emerging Dorset Local Plan. In the meantime, the checklist encourages best practice.</p> <p>40. Adopted policies within Neighbourhood Plan documents already form part of the development plan and therefore are considered when planning applications are determined.</p> <p>41. The checklist is intended to enable decision makers to see in a consistent way how an application is addressing sustainable design and construction. Decision makers will need to use this information to determine how the application responds to any relevant adopted policies and how the application responds to climate change, which is a material consideration. Applications will still be determined in accordance with the development plan (adopted local plans and neighbourhood plans).</p> <p>42. The checklist will need to be submitted for relevant applications as part of the validation requirements. However, applicants will not have to meet best practice standards unless they are already required by policies in adopted local plans.</p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>42. As the documents are advisory, they are likely to be ignored.</p> <p>43. LETI scheme or passivhaus standards should be mandated.</p> <p><u>Public response</u></p> <p>44. Need to understand where the proposed targets fit on the on the net-zero scale - it is important to show through measurement that building efficiency is progressing to net zero.</p>	<p>44. <b>The Checklist will set out that if an applicant uses the best practice objectives presented this will enable a building/development to be net-zero in its carbon emissions, or zero carbon ready for when the UK's electricity grid decarbonises.</b></p>
<p><b>Level of detail required for planning application stage</b></p>	
<p><u>Developers/agents</u></p> <p>45. Many of the requirements listed in the checklist will not be known at outline stage.</p> <p>46. A separate 'principles driven' checklist for outline applications should be prepared. This should provide sufficient flexibility for a range of quantifiable sustainability measures to be explored at the reserved matters stage, which can then cross refer to a more detailed sustainability checklist.</p> <p>47. Any validation and assessment requirements must be proportionate and reasonable in the context of an outline application.</p> <p>48. It would be more useful to require high level commitments to sustainability in planning guidance and use conditions appropriately for details.</p> <p>49. Sustainability Statements are not a perfect tool for assessing and securing the quality of sustainable design and construction – content relates to detailed matters which are often not fixed at the planning stage, especially with outline permissions.</p> <p><u>CCAONB</u></p> <p>50. Many of the design and construction features may require additional professionally prepared statements at the planning application stage, adding to costs. It would be more practical to have tradesmen certified schemes (such as FENSA and HEATAS) at the construction stage rather than more paperwork at the application stage.</p> <p><u>Public response</u></p> <p>51. Suggestion that regulations already exist, and we should avoid making the process more onerous.</p>	<p>45/46/47/48/49. Outline applications will not be exempt but it is acknowledged that some of the information will not be available at this stage. Clearer wording regarding the level of information required for different application types will be included. The level of information will be proportionate and relevant relative to the nature and scale of the proposal, and the application type. An amendment will be made to clarify this.</p> <p>49/50. Sustainability Statements and Checklists are becoming a common tool nationally for setting out the climate and net-zero credentials of a development at planning application stage. It is considered that the information required, for detailed planning applications, can be provided.</p> <p>51. Building Regulations as they stand do not have high energy and water efficiency standards and the specific timeline for the Future Homes Standard is unknown, although it is expected within the next couple of years. The checklist is therefore intended to encourage best practice wherever practicable. Additionally, many applications being made now will have construction timelines that necessitate consideration of likely new Building Regulations standards.</p>
<p><b>Impact on viability</b></p>	
<p><u>Developers/landowners/agents</u></p> <p>52. The Sustainability checklist should be accompanied with a 'principles driven' list so that viability issues do not arise.</p> <p>53. How will the requirements impact on viability? There is a need to ensure the checklist is appropriate so that measures do not generate potential viability issues for development.</p> <p>54. Need to ensure Government incentives and funding.</p> <p>55. The guidance is contrary to PPG Paragraph Reference ID: 61-008-20190315 as it will add unnecessary financial burden to development.</p> <p>56. No viability assessment has been undertaken to support the checklist.</p> <p>57. Reliance on Cornwall evidence - use of another Council's evidence contrary to sentiment of PPG</p> <p>58. Introduction of a higher net zero standard and embodied carbon requirement could easily deem a site unviable.</p> <p>59. Concern with additional costs of making an application associated with additional requirements of the checklist.</p> <p>60. Applicants will not want to pay for calculations associated with technical design without having planning permission.</p> <p>61. Assessments and calculations are expensive and will rule out your typical homebuilder before they even get planning, and unfairly favour major monopoly developers who can make up these assessments in-house.</p> <p>62. Most development is done on traditional procurement, and all of these section questions are putting the cart before the horse for this most-common type.</p> <p><u>Sport England</u></p>	<p>52, 53, 55, 58, 62, 66. If the best practice objectives within the checklist will have impacts on the viability of a development applicants should highlight this within their completed checklist. However, we are urging applicants to do as much as they can within the confines of viability to tackle climate change.</p> <p>54. This is outside of the scope of the checklist.</p> <p>55, 66, 59, 60, 61. The requirement of a completed checklist is considered necessary in the current context of climate change - for the relevant development types stated. The level of information will be proportionate and relevant relative to the nature and scale of the proposal, and the application type so that costs associated with completing the checklist are scaled to the development type. <b>An amendment will be made to clarify this.</b> It should be noted that the questions related to energy and embodied carbon are best practice objectives and not requirements. Any energy use calculations required to complete the checklist would need to be undertaken for the Building Regulations process and therefore the cost of undertaking such work may already be factored into development costs. <b>The checklist will be amended to make clear that if it is not practicable to provide energy calculations details of measures being incorporated into a scheme to maximise energy efficiency should be provided.</b></p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>63. Concern with additional costs for sports and community clubs to make them more sustainable both in terms of running costs and construction costs.</p> <p>64. The use of CIL or S106 funds should be able to be used to assist community buildings meet the new targets.</p> <p><u>Public response</u></p> <p>65. Concern with the sacrificing of sustainability credentials for viability reasons.</p> <p>66. Suggest considering rainwater harvesting and energy resources on a locale basis rather than an individual property basis – should be cheaper.</p> <p>67. Very complex and will add costs to all projects.</p> <p><u>Dorset Council Cllrs</u></p> <p>68. Query interactions with viability calculations.</p> <p>69. Concern with viability impacts on other provision such as affordable housing.</p> <p>70. Suggest insisting on requirements regardless of cost impacts and let the market decide.</p> <p>71. It is cheaper in the long run to build proper insulated buildings with micro energy generation and recycling than to retrofit or use fossil fuels to heat a cold building?</p>	<p>56, 57, 67, 68. Formal viability assessment on objectives will be undertaken through the development of policy for the Dorset Council Local Plan. Similar sustainable construction standards have been recently set into policy by nearby local authorities<sup>2</sup>, which have been subject to viability appraisal and found to be viable for most development types. Whilst it is noted that there may be some differences in costs for different areas, it is considered that, with reference to these cases, the best practice objectives presented in the checklist can be achieved for development in Dorset. It should be noted that the targets in the checklist are generally best practice objectives and not mandatory requirements, and therefore policy requirements such as affordable housing will take precedent should viability become a concern.</p> <p>62, 63. Noted. It is outside of the scope of the checklist to identify funding strategies for meeting energy efficiency.</p> <p>64. Money from CIL and s106 agreements can be used to fund infrastructure that is needed as a result of a development. This might include schools, road improvements, flood defences and green spaces, for example.</p> <p>65, 67, 68, 69. We are urging applicants to do as much as they can within the confines of viability to tackle climate change through meeting best practice objectives. However, it is acknowledged that viability may be a restricting factor. It is not possible at this stage to insist on requirements, different options for this will be considered through the emerging Dorset Council Local Plan.</p> <p>66. We are open to flexibility in considering these issues and if such an approach can be effective and more financially viable then applicants may submit details in their completed checklist. <b>An amendment will be made to clarify this.</b></p> <p>70. It is not possible to insist on requirements unless they are already stated in the policies of the adopted local plans.</p> <p>71. Noted</p>
<b>Monitoring and enforcement</b>	
<p><u>Parish and Town Councils, Sport England</u></p> <p>72. It is not clear how response will be judged and how the degree of compliance will be assessed.</p> <p>73. To ensure standards are actually achieved checks will be required after the development is completed. Who is responsible.</p> <p>74. Need for upskilling and training for planners and enforcement team.</p> <p><u>Local environmental organisations</u></p> <p>75. Funding proper informed evaluation of applicants' submissions is essential.</p> <p>76. Training should be offered to builders to ensure they are informed and confident about achieving the highest performance of the checklist.</p>	<p>72, 75. The checklist will be a requirement for validation of a planning application and therefore its completion will be a requirement before a planning application is formally registered. In most cases the best practice objectives will not be mandatory and therefore not enforceable however where appropriate the council will consider using planning conditions to ensure measures detailed in an application are undertaken. Conditions may involve checks during construction and post completion.</p> <p>73, 74, 76. Guidance exists in the Net Zero Carbon Toolkit. Training opportunities will also be explored for officers within the council.</p>
<b>Changes in technology</b>	
<p><u>Developers/agents</u></p> <p>77. Concern that for developments that take a long time to complete may be affected by changes in technology in relation to sustainable design.</p>	<p>77. It is noted that this is a fast moving environment, and that technology changes and updates are likely to occur during the course of a development. Where changes are needed to a development this can be addressed through normal channels of dialogue with the council post permission, such as through Non Material Amendments and Compliance with Condition applications. The guidance can also be updated should this be required.</p>

<sup>2</sup> See the Cornwall Climate Change DPD, and BANES Local Plan update.

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<b>Energy efficiency/standards</b>	
<u>Parish and Town Councils</u>	
<p>78. Would like to see Dorset follow suit in BCP's decision to introduce passive house energy standards in new builds.</p> <p>79. Ideally insulation standards should be uprated further urgently to FHS equivalent, so as to avoid costly retrofit later.</p> <p>80. New builds must have connections for heat exchange pipes and suitable radiators/underfloor arrays.</p> <p>81. Query whether the BRE standards up to date?</p> <p>82. It should be in the interests of a developer to build to passive house standards as it would be more attractive and valuable to home buyers, particularly first-time buyers to purchase an energy-efficient property, to lessen the burden of retrofit costs in the future and offer cheaper energy running costs.</p>	<p>78, 79. Options for the development of policy in relation to energy efficiency of buildings (including insulation) will be considered through the emerging Dorset Council Local Plan. The best practice objectives as presented in the checklist are considered largely to reflect passivhaus standards and expected Future Homes Standards, and also take account of insulation of buildings.</p> <p>80. The best practice objectives in the checklist take account of all technologies needed to achieve the maximum energy efficiency of buildings. This will include suitable efficient heating technology.</p> <p>81. BRE standards are currently considered to be the most up to date in terms of the sustainability of non-domestic buildings.</p> <p>82. Agreed. The checklist already highlights cost effectiveness in terms of addressing such matters at the outset.</p>
<u>Developers/agents</u>	
<p>83. The Planning Practice Guidance states supplementary planning work such as the checklist cannot form new policy.</p> <p>84. The standards and detail go far beyond adopted local plan policies.</p> <p>85. Outlines expectations that new development come forward with significant energy reductions against current Building Regulations and adopted policy.</p> <p>86. The requirements are not being introduced with robust analysis and appraisal of the effects on viability .</p> <p>87. Specific targets and wording on achieving ultra-low energy demand should be removed until they are incorporated into Local Plan policies.</p> <p>88. BREL report is beyond what is necessary at application stage.</p> <p>89. Current measures proposed as suitable in the checklist go above and beyond proposed national building regulation standards, which already take into account the need to mitigate for climate change.</p> <p>90. Guidelines should reflect the need to provide development which is in accordance with national building regulations, and that anything beyond this is aspirational - this will need to be clear to aid officers and councillors when making decisions.</p> <p>91. Energy performance can only be accurately calculated once the technical design (the longer and most costly design phase) is done.</p> <p>92. If changes are needed to a design after the calculations, then a planning variation can be made if the change is material enough.</p> <p>93. With the efficiency of ASHP, sometimes solar panels are just not needed to achieve high performance, and a lack of solar panels might be a bad mark against the project, even when they simply aren't needed.</p> <p>94. The following measures would need to be applied in combination, and as a minimum, to meet proposed standards as set out in part 1.1 of the sustainability checklist: Triple glazing, Mechanical Ventilation with Heat Recovery, Air source heat pump, Maximum fit of Solar PV arrays on one or more roof slopes</p> <p>95. 1.3 'Has the risk of overheating been considered in the design of the development?' would seem onerous and unlikely to be able to be properly answered at the planning application stage where design may be subject to change.</p> <p>96. Overheating is considered as part of current building regulations assessment criteria. It is suggested this element be removed from the checklist as a non-planning matter.</p>	<p>83, 84, 85, 87, 89, 90. It is not the intention that the checklist forms new policy. The document makes it clear that it presents best practice objectives that applicants can use in order to build to achieve maximum sustainability. Adopted local plan policies remain the primary consideration when determining planning applications, and Building Regulations remain the minimum standards to which development must be built.</p> <p>86. Formal viability assessment on targets will be undertaken through the development of policy for the Dorset Council Local Plan. Similar sustainable construction standards have been recently set into policy by nearby local authorities<sup>3</sup>, which have been subject to viability appraisal and found to be viable for most development types. Whilst it is noted that there may be some differences in costs for different areas, it is considered that, with reference to these cases, the best practice objectives presented in the checklist can be achieved for development in Dorset. It should be noted that the targets in the checklist are generally best practice objectives and not mandatory requirements, and therefore policy requirements such as affordable housing will take precedent should viability become a concern.</p> <p>88, 91. There will be a need for developers to produce BREL reports and predictive EPC assessments during the detailed design and building control stages of development. It is not considered unreasonable for this information to be supplied at the earlier planning stage where it can enable applicants to consider the issue of energy efficiency upfront and help to demonstrate energy efficiency measures being proposed. <b>However, it is noted that it may not be practicable to supply this information in all cases and therefore the checklist will be amended to reflect this.</b></p> <p>92. Agreed</p> <p>93. Applicants should explain the proposed approaches within the completed checklist, including any justification for using/not using certain technologies.</p> <p>94. Noted.</p> <p>95, 96. The overheating of buildings is considered a planning matter in the context of sustainable design and construction (as reflected in newly adopted planning policies for nearby local planning authorities<sup>4</sup>), and we encourage applicants to provide as much information as is possible at planning stage. It is noted that designs can change, however we encourage climate change to be considered at the outset of design.</p> <p>97. Noted. The figures presented are guidelines only and it is noted that different types of buildings will have different requirements. <b>We will add further text to explain this.</b></p>
<u>Sport England</u>	
<u>Sport England</u>	
<p>97. Sports and Leisure &lt;80kwh/m2.yr - This is not a fair reflection of the different types of buildings which fall in this category – different uses have different requirements.</p>	

<sup>3</sup> See the Cornwall Climate Change DPD, and BANES Local Plan update.

<sup>4</sup> BANES, Cornwall



Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>98. Suggests working with Sport England to look at more achievable and realistic targets for sports related buildings; and separating out sports from leisure buildings or at least create a better definition - Sport England is currently working with Sport Scotland in this area.</p> <p><u>CPRE</u></p> <p>99. Any development that starts now under existing regulations will have to be retrofitted in the future at significant extra cost.</p> <p>100. Consideration should be given to designing layouts of new development to be configured south facing and making solar gain a sustainability requirement of new development.</p> <p><u>Local environmental organisations</u></p> <p>101. It doesn't set any standards or questions about the extent of any renewable energy generation installed on/by the building.</p> <p>102. Suggest there be a Checklist question about the estimated amount of renewable energy generated per year by energy installations at each building, and standards set for the generation of solar energy.</p> <p>103. Checklist 1.2. Second column. Reducing energy consumption and carbon emissions - suggest that words 'the electricity grid' should replace 'the grid' - the gas network can sometimes be referred to as a 'grid'.</p> <p>104. The measure of a building being net zero carbon is based on a time in the future when/if the national electricity grid is decarbonised.</p> <p>105. Believe that developers should be incentivised through the Checklist and their Sustainability Statement to design buildings with integrated PV panels and to orientate any building to maximise the generation of solar energy.</p> <p>106. Solar panels on roofs and heat pumps must be made compulsory for new builds and significant conversions. Energy independence through access to renewable energy generation and batteries should be encouraged.</p> <p><u>Local community organisations</u></p> <p>107. Query does predictive energy modelling cover churches?</p> <p><u>Dorset Council Cllrs</u></p> <p>108. Need to stop housebuilders and developers churning out very expensive but badly insulated new homes - these are unfit for 21st century and will need retrofitting.</p> <p><u>Public response</u></p> <p>109. Suggest considering energy resources on a local basis rather than an individual property basis – should be cheaper.</p> <p><u>Dorset Council officers</u></p> <p>110. Paragraph 1.2 is not entirely clear about whether the "grid" referred to is purely the electricity grid or whether it also refers to the gas grid.</p> <p>111. The issue is whether the developer can base the answer to this question on the idea that connecting new builds to the gas grid can be justified on the assumption that green hydrogen for general space heating will be practical.</p>	<p>98. Noted, we would welcome further engagement.</p> <p>99, 108. Noted. This is one of the reasons for producing the checklist and presenting best practice objectives.</p> <p>100, 105. The layout of development and orientation of buildings is incorporated into the approach of the best practice objectives.</p> <p>101, 102. Question 1.2 asks this but doesn't set a standard for an amount of energy generation. The question relates to whether the anticipated energy consumption of a development will be matched by the amount of onsite renewables proposed. <b>An amendment will be made requesting metrics for energy generation, where possible.</b></p> <p>103, 110. Noted. <b>Reference to grid decarbonisation will be removed from this section and addressed in the explanatory text above, with reference to the 'energy grid' rather than 'electricity grid'.</b></p> <p>104. Noted. <b>This will be clarified in the preceding explanatory text.</b></p> <p>105. The checklist encourages best practice.</p> <p>106. Currently we are unable to make these technologies compulsory as they are not required by adopted planning policies. We will be considering different options through the production of the Dorset Council Local Plan.</p> <p>107. The checklist would be a requirement for new buildings and some changes of use/extensions. Therefore, development of new build churches would be covered however general alterations to existing churches would not.</p> <p>108. The checklist is intended to encourage applicants to think about energy efficiency at the outset.</p> <p>109. We are open to flexibility in considering these issues and if such an approach can be effective and more financially viable then applicants may submit details in their completed checklist.</p> <p>110. This will be clarified.</p> <p>111. Noted.</p>
<b>Embodied carbon</b>	
<p><u>Developers/agents</u></p> <p>112. Embodied carbon assessments are significant additional pieces of work not required by policy – this requirement should be removed.</p> <p>113. The expectation that demolition of existing buildings is balanced with needs of new development is already embedded within determination of applications.</p> <p>114. The checklist should be amended to request information on the reasons for demolition in planning applications.</p>	<p>112. Further consideration has been given to embodied carbon and whole life carbon assessments. The proposed checklist doesn't require such studies to be carried out, however they can be useful in determining the carbon impact of a development. <b>The proposed wording will be amended in order to better reflect that lifecycle modelling is not a policy requirement.</b></p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>115. The Council should consider that new development will often be far more sustainable in many circumstances including building fabric, by use of modern methods of construction and through optimisation of a site.</p> <p>116. The Council needs to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration prior to requiring such a consideration. This is not readily available from a majority of suppliers.</p> <p><u>CPRE</u></p> <p>117. There should be a mandatory requirement for the applicant to undertake Whole Life Carbon assessments for any development over 1000sqm. The RICS Professional Statement for assessment whole life carbon in the built environment should be adopted as the approved methodology. Whole life carbon incorporates operational carbon emissions from day to day energy use and embodied carbon emissions. Other councils are already mandating WLC assessments.</p> <p>118. DC should adopt the Future Homes standard as soon as possible.</p> <p>119. There should be emphasis on preference for refurbishing existing buildings on an application site as opposed to construction of new buildings. A viability assessment should be required for proposed rebuilds.</p> <p><u>Parish and Town Councils</u></p> <p>120. The sustainability assessment should preference retrofitting over construction of new buildings because of the embedded energy - planning consent should be required before carrying out the demolition of existing buildings.</p>	<p>113. Agreed, however information is not always explicitly provided to assist the decision maker in understanding the pros and cons of demolition versus refurbishment.</p> <p>114. It is agreed that a question asking for information on the reasons for a proposed demolition would be useful for the decision maker. <b>This will be added into the checklist.</b></p> <p>115. Information to help inform the decision maker on a case by case basis will be helpful in this regard and this is why the checklist includes objectives in relation to demolition and embodied carbon.</p> <p>116. Noted.</p> <p>117, 118. Different options will be considered through development of policy in the Dorset Council Local Plan. A mandatory requirement cannot be imposed through the checklist. <b>Reference will be made to the RICS Whole Life Carbon Assessment document in the guidance notes.</b></p> <p>119, 120. <b>The checklist will include setting out reasons for demolition.</b> It will not specify a viability assessment in respect of new builds however this can be considered on a case by case basis.</p>
<p><b>Sustainable materials</b></p>	
<p><u>Developers/agents</u></p> <p>121. Schedules of materials and construction technologies is more suited at the post application stage as detailed information can be compiled by the end developer. This is liable to change from the application stage. Therefore, it is more useful to require high level commitments to sustainability and use planning conditions for detail.</p> <p>122. Checklist question 2.1 requires a schedule of materials and construction methods, a detail which is normally reserved by condition.</p> <p>123. Relies on assessments and decisions made at the building control/technical phase, which cannot be undertaken on a planning level design.</p> <p>124. The least sustainable materials can actually come out as being 'better' when LCA is carried out - because the synthetic and toxic materials with high energy performance are the current standard materials so are more local and accessible than the actually non-harmful and properly renewable materials.</p> <p>125. Need to promote and encourage a transition to sustainable materials so that demand increases for the actually better materials and costs reduce and they become more local.</p> <p>126. Part 2.1 - It should be noted that the production of a full lifecycle carbon assessment is a large undertaking and report in itself and arguably should not be required at the planning stage. The level of detail required should be clarified.</p> <p><u>Environment Agency</u></p> <p>127. EA recommend a greater emphasis is placed on local materials to cut down on carbon emissions from transport.</p> <p><u>Historic England</u></p> <p>128. Within section 2 of the statement there is implicit recognition of the desirability of conversion/renovation of existing buildings having regard to embodied carbon - there are also circumstances where this will be beneficial in terms of the historic significance of the building and what it contributes to the character of the area.</p> <p><u>Local environmental organisations</u></p>	<p>121, 122. It is agreed that materials and construction methods can be secured by condition. However, stating these up front where possible is helpful to understand how the proposal is considering sustainability design and construction. It is helpful to set out any intentions to use local materials.</p> <p>123. Consideration of materials to some degree is appropriate at the planning stage, with further details secured by condition.</p> <p>124. Noted.</p> <p>125. Agreed.</p> <p>126. Further consideration has been given to embodied carbon and whole life carbon assessments. It is understood that the reports are complex. The proposed checklist doesn't require such studies to be carried out, however they can be useful in determining the carbon impact of a development. <b>The proposed wording will be amended in order to better reflect that lifecycle modelling is not a policy requirement.</b></p> <p>127. The checklist includes consideration of locally produced and sourced materials.</p> <p>128. Agreed.</p> <p>129. Different options will be considered through development of policy in the Dorset Council Local Plan. A mandatory requirement cannot be imposed through the checklist.</p> <p>130. The checklist does refer to embodied carbon.</p>

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<p>129. Any reference to building materials should set out a requirement for Lifecycle Carbon Assessments, without this the council is inviting shallow claims for 'sustainability' which will amount to little more than greenwashing.</p> <p><u>Businesses</u></p> <p>130. Concern with lack of reference to embodied carbon.</p>	
<b>Minimising waste and increasing recycling</b>	
<p><u>Developers/agents</u></p> <p>131. Section 3.1 - Construction company is usually not known till after tender, which comes after technical design/building control, which is after planning - an unanswerable question for anyone except a major monopoly developer on design and build procurement.</p> <p>132. 3.2 - SWMP is provided by contractor after they have been appointed, again after tender, after technical phase, which comes after planning.</p> <p>133. 3.3 provision for waste storage and collection is actually answerable on a planning level design - although I believe this is already included as a question in full applications?</p> <p>134. 3.4 Choices of appliances and furnishings - this is done by the applicant in the handover phase, when construction is winding down, after tender, after technical/building regs and long after planning – suggestion to remove the requirement.</p> <p>135. Question 3.4 - Any condition or legal obligation that sought to do so would not meet statutory tests.</p> <p><u>Public response</u></p> <p>136. The construction industry providers use a lot of unrecyclable packaging and are often negligent in even putting their waste in a secured container, let alone recycling it. Requirements need to be put in line in order to address these issues.</p> <p><u>Local environmental organisations</u></p> <p>137. The PPG6 pollution prevention guidance issued by the UK Environment Agencies was withdrawn in 2015, but is still a useful guide for construction and demolition sites (<a href="https://www.gov.uk/government/publications/construction-and-demolition-sites-ppg6-prevent-pollution">https://www.gov.uk/government/publications/construction-and-demolition-sites-ppg6-prevent-pollution</a>)</p>	<p>131. Noted. <b>The wording will be amended to note that this information should be provided where possible.</b></p> <p>132. Noted, however it is common practice for a site waste management plan to be requested and secured by condition.</p> <p>133. It is correct that this is a question on the application form and so this can be cross referenced. Where this is not known, i.e. at outline stage, this can be stated.</p> <p><b>134, 135. It is agreed that this is quite detailed and this question will be removed.</b></p> <p>136. This may be covered by a site waste management plan.</p> <p>137. Noted.</p>
<b>Conserving water resources</b>	
<p><u>Developers/agents</u></p> <p>138. Inclusion of indicative specifications for how dwellings will reduce internal water usage more appropriate than provision of water consumption calculations. This can be supplemented by conditions requiring detailed calculations. Considered this would be a more proportionate response which can greatly improve standards without adding costs at application stage.</p> <p>139. Water calcs are provided alongside SAPs for building control, after the technical design is made, which comes after planning.</p> <p>140. 4.2 - Provision for rainwater harvesting can be shown at planning, but I believe the SuDS hierarchy around RW collection/disposal is already a question within planning applications, so it's redundant to have again here.</p> <p><u>Environment Agency</u></p> <p>141. EA pleased to see a reduced water efficiency target of 110 litres per person per day for dwellings is included and agree with the justification provided for this target.</p> <p>142. EA recommended that this requirement is extended to include change of use.</p> <p>143. EA recommend that a water efficiency requirement is included for all new non-residential development of 1000sqm gross floor area or more, which should meet the BREEAM 'excellent' standards for water consumption.</p> <p>144. EA wish 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</p>	<p><b>138. Agreed that this would be appropriate and so the wording will be amended to reflect this.</b></p> <p><b>139. Wording will be amended to state indicative specifications for how dwelling will reduce internal water usage.</b></p> <p>140. It is considered useful to have it in the checklist so that all sustainability considerations are brought together.</p> <p>141. Your support is welcomed.</p> <p>142, 143. The checklist is applicable to change of use applications and new non-residential, as set out in the proposed paragraph 39 of the Local List. The water efficiency objectives are not mandatory, however for East Dorset and North Dorset there is a policy requirement for development to be water efficient. Meeting this objective would therefore ensure compliance with the relevant policy criteria.</p> <p>144. Noted.</p> <p>145. Your support is welcomed.</p> <p>146. Noted.</p> <p>147. Wessex Water's engagement in the Local Plan policy would be welcomed.</p> <p>148, 149, 150. Noted.</p>

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<p>available. There should be an assumption against the proliferation of private sewage treatment systems and private water supplies.</p> <p><u>Wessex Water</u></p> <p><b>145.</b> Welcome the requirement for applicants to demonstrate how water consumption will be minimised. As identified within the Position Statement, the Wessex Water region is classed as a water stressed area and as such it is appropriate to target a reduced water use of 110 litres per person per day for dwellings.</p> <p><b>146.</b> Rainwater harvesting is beneficial in that as well as reducing potable water use it also treats rainwater as a resource and can reduce surface water run off.</p> <p><b>147.</b> Invite further dialogue to help with the drafting of policies in the Local Plan, including the better management of rainwater.</p> <p><b>148.</b> Rainwater should be treated first and foremost as a resource to be valued for the benefit of people and the environment.</p> <p><b>149.</b> Rainwater should be discharged back to the environment as close as possible to where it lands or channelled to a close watercourse and not combined with sewage.</p> <p><b>150.</b> Would welcome an improved planning policy approach to property-level rainwater management through a requirement for local capture, re-use and discharge back to the environment.</p> <p><u>Local environmental organisations</u></p> <p><b>151.</b> Support the target of 110 litres per person per day and suggest that water butts as a method of rainwater harvesting should be considered as a standard requirement wherever possible.</p> <p><u>Public response</u></p> <p><b>152.</b> Suggest considering rainwater harvesting on a locale basis rather than an individual property basis – should be cheaper.</p> <p><b>153.</b> Rainwater harvesting and/or water recycling should become mandatory in all new builds and where feasible, extensions.</p> <p><b>154.</b> Should include the requirement to show that existing water supplies (i) will not be adversely affected, and (ii) will be adequate to support the proposed development - N.B. this is not covered by current wording about consumption and efficiency of use.</p> <p><u>Parish and Town Councils</u></p> <p><b>155.</b> Concerned with flooding and would like to ensure that all new developments not only separate out rainwater from foul water but also connect them to separate drainage systems.</p> <p><b>156.</b> There should be soak aways and ponds on all new estates and water butts on roof down pipes mandated on all new builds.</p>	<p><b>151.</b> Your support is welcomed.</p> <p><b>152.</b> We are open to flexibility in considering these issues and if such an approach can be effective and more financially viable then applicants may submit details in their completed checklist.</p> <p><b>153.</b> Existing adopted local policies covering North Dorset and East Dorset have this requirement.</p> <p><b>154.</b> Water companies will provide this information as consultees on planning applications.</p> <p><b>155, 156.</b> Sustainable drainage systems are required by existing adopted local policies. The Local List requires the submission of surface water drainage details for major applications.</p>
<p><b>Green infrastructure</b></p>	
<p><u>Developers/agents</u></p> <p><b>157.</b> It is difficult to know the exact extent of green technologies until the technical design is made and SAPs performed, and sometimes the result can be surprising.</p> <p><b>158.</b> Site constraints dictate a lot about what green technologies are feasible for a development – concern with developers being 'punished' by planning for not having green tech shown at planning, when it's not yet known if it's needed, or it's simply never going to be feasible for their site.</p> <p><u>CPRE</u></p> <p><b>159.</b> Any new development should be able to demonstrate a 20% gain in green infrastructure – measures can include green facades and habitats on roofs.</p> <p><u>Woodland Trust</u></p> <p><b>160.</b> Trees can support the UK's Net Zero objectives in a variety of ways, both mitigating the impacts of climate change such as helping manage water flows associated with increased instances of extreme rainfall delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade and contributing to sustainable urban drainage systems.</p>	<p><b>157, 158.</b> We are encouraging applicants to provide as much information as possible at planning application stage, noting that designs can change and further detail can be provided later where appropriate. Any changes can go through the normal post planning permission application routes.</p> <p><b>159.</b> This is not a current policy requirement; however the checklist encourages the provision of green infrastructure.</p> <p><b>160, 161, 162.</b> Noted. Trees are an important part of green infrastructure as noted in the checklist.</p> <p><b>163.</b> This is not a current policy requirement; however the checklist encourages the provision of green infrastructure.</p> <p><b>164.</b> This is beyond the scope of this document.</p> <p><b>165.</b> This is taken into consideration in the consideration of landscaping schemes.</p>

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<p><b>161.</b> Trees also make a valuable contribution to the quality of the public realm, helping reduce air, noise and light pollution and improve people’s mental health.</p> <p><b>162.</b> Their loss and replacement requires careful management to ensure that they are able to sustain these benefits in the future.</p> <p><b>163.</b> The checklist should include a guarantee of tree-lined streets and nature-rich woodlands in all new housing developments through a minimum of 30% tree-canopy cover for a development area, including retaining mature trees.</p> <p><b>164.</b> Should include increasing tree-canopy cover in existing housing estates where it is below the England urban average (16%). Public funding should be targeted at areas where there are other critical needs such as tackling social and economic inequalities.</p> <p><u>Local environmental organisations</u></p> <p><b>165.</b> The checklist should ask: Will landscaping use only indigenous species? How will it contribute to nature enhancement (e.g. through ecosystem renewal of enhancement of green corridors)?</p> <p><b>166.</b> Suggest applicants should be asked to provide management plans including maintenance and funding arrangements for, ideally, the next 25 years.</p> <p><u>Local community organisations</u></p> <p><b>167.</b> The definition of green infrastructure is inadequate and examples of what it covers should be provided. In particular it should be made clear that public rights of way are part of our green infrastructure.</p> <p><b>168.</b> Maps should be provided to show how existing green infrastructure fits into the proposed development, and any new items of green infrastructure which are being provided.</p> <p><u>Local member</u></p> <p><b>169.</b> Can urban trees be protected?</p> <p><u>Business</u></p> <p><b>170.</b> Much closer relationships between trees and development should be encouraged to manage the effects of climate change around and in buildings.</p> <p><b>171.</b> Importance of trees in mitigating the effects of climate change - as providers of wind breaks and trees as providers of shade for buildings and urban areas.</p> <p><b>172.</b> Need for a strategic look at localities that would benefit from planted windbreaks, particularly coastal communities.</p> <p><b>173.</b> Need to be looking at strategic woodland planting to slow down the passage of rainwater and help manage flash flooding downstream in our residential areas.</p> <p><u>Parish and Town Councils</u></p> <p><b>174.</b> We welcome inclusion of tree cover to mitigate heat waves in urban settings.</p> <p><u>Public response</u></p> <p><b>175.</b> Needs far more detail and requires set standards and policies, not just an explanation from an applicant.</p> <p><b>176.</b> Policies for development in countryside, policies for infilling - gardens are important greenspace and policy is needed to control garden development to protect greenspace and preserve street densities.</p> <p><b>177.</b> Green Infrastructure talks of provision within developments and needs to be extended in scope to cover retention of green infrastructure as part of development proposals.</p>	<p><b>166.</b> In some cases, landscape and ecological management plans are required by condition.</p> <p><b>167. The text will be amended to include reference to public rights of way.</b></p> <p><b>168.</b> The need for plans showing green infrastructure provision will be on a case by case basis.</p> <p><b>169.</b> Urban trees can be protected by Tree Preservation Orders.</p> <p><b>170, 171.</b> It is noted that trees are an important asset in managing the effects of climate change. The provision of trees is covered by the ‘green infrastructure’ section of the checklist.</p> <p><b>172, 173.</b> The provision of strategic tree planting is outside of the scope of the checklist. Such provision may be considered through the production of a strategic policy document such as the Dorset Council Local Plan.</p> <p><b>174.</b> Noted.</p> <p><b>175.</b> It is anticipated that other supporting planning documents will provide the detailed information regarding green infrastructure provision, and therefore it is considered appropriate to allow applicants to summarise these aspects rather than creating duplication of information.</p> <p><b>176.</b> More strategic policy is outside of the scope of the checklist. Different options for policies can be considered through the production of a strategic policy document such as the Dorset Council Local Plan.</p> <p><b>177.</b> Noted. An objective to summarise how green infrastructure is being retained in a development will be added.</p>
<b>Flood risk and drainage</b>	
<p><u>Developer/agent</u></p> <p><b>178.</b> This is already included at building control, so it's redundant to include at planning as well.</p> <p><b>179.</b> It sometimes takes getting onto site and into the construction phase to assess what drainage is actually the best fit for the site, because site discoveries and build costs are important factors which cannot be known in planning phase.</p>	<p><b>178.</b> This is a requirement of existing adopted local policies and it is common practice to consider at the planning application stage to some level.</p> <p><b>179.</b> Noted.</p>

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<p><u>Environment Agency</u></p> <p><b>180.</b> The guidance and checklist reference the appropriate sections on flood risk as set out in National Planning Policy.</p> <p><b>181.</b> When referring to flood risk, the guidance should also acknowledge the impact of coastal change. This would be through Coastal Change Management areas which are on the former Purbeck and West Dorset coasts. The <a href="#">National Coastal Erosion Risk Map</a> (NCERM) shows coastal erosion rates for the short, medium and long term and your guidance should consider the relevant <a href="#">Shoreline Management Plan</a>.</p> <p><u>CPRE</u></p> <p><b>182.</b> Reference is made to SuDS as a method of managing flood risk – this does not go far enough.</p> <p><b>183.</b> All sites should have a full flood risk assessment as part of the checklist.</p> <p><b>184.</b> Any site with known history of surface water flooding or with previous flood risk refusals should be categorised as unsustainable and recorded as such in the Local Plan.</p> <p><u>Local environmental organisations</u></p> <p><b>185.</b> Suggestion to ask what impact will the development have on increasing hard surfaces, increasing runoff and drainage flow, damaging natural ecosystems (including through increasing public access to sensitive sites)?</p> <p><b>186.</b> Suggest applicants should be asked to provide management plans including maintenance and funding arrangements for, ideally, the next 25 years.</p> <p><u>Public response</u></p> <p><b>187.</b> Encourage use of permeable surfaces.</p> <p><b>188.</b> Where surface water is captured and runs downhill it could generate energy.</p> <p><b>189.</b> Re-using grey water saves energy in raising excess water.</p> <p><u>Parish and Town Councils</u></p> <p><b>190.</b> Where possible permeable-surfaces are preferable, to hard-landscaping in developments; to assist with for flood mitigation, preventing sewer incidents, and recharging our underground aquifers.</p> <p><b>191.</b> SuDs needs to be considered from a strategic infrastructure perspective as increased housing places more strain on drainage systems built in an earlier age.</p> <p><b>192.</b> Can there be more definition of what ‘sustainable drainage’ entails?</p> <p><b>193.</b> Water run-off from buildings and impermeable structures should be dealt with at source, wherever possible, through soak aways, storage and use in grey water systems, only as a last resort should this be let into the storm drains - CIL should be charged where this is not achieved.</p> <p><b>194.</b> In an urban context, the ability to separate foul and surface water sewerage supply should be made a requirement for all new houses and all existing houses undergoing renovation or extension.</p> <p><b>195.</b> Given our flooding and water treatment pressures, all sites should have a full flood risk assessment as part of the sustainability check list.</p>	<p><b>180.</b> The Environment Agency’s confirmation is welcomed.</p> <p><b>181.</b> Noted. The Coastal Change Management Areas will be designated as part of the emerging Dorset Council Local Plan.</p> <p><b>182, 183, 184.</b> Flood risk and the need for flood risk assessments is considered for each application in line with the NPPF.</p> <p><b>185.</b> This is considered through the drainage strategies for planning applications.</p> <p><b>186.</b> This is not considered to be proportionate.</p> <p><b>187.</b> This is encouraged through sustainable drainage policies.</p> <p><b>188.</b> Noted.</p> <p><b>189.</b> Agreed. The checklist refers to water conservation measures in section 4.</p> <p><b>190.</b> Agreed.</p> <p><b>191.</b> Sustainable drainage is considered through the Local Plan and site allocations.</p> <p><b>192. A definition will be added in section 6.</b></p> <p><b>193, 194.</b> Agreed and this is considered through submitted drainage strategies.</p> <p><b>195.</b> The requirement for a flood risk assessment is set out in the NPPF (footnote 55).</p>
<b>Adaptation to climate change</b>	
<p><u>Developers/agents</u></p> <p><b>196.</b> This section on its own is probably all the checklist needs to be - at planning phase, general strategies and aims for protection against climate change, prevention of undue increase to climate change, lowering risk of overheating, having good fabric-first design and retention of heat etc could be listed out based on a planning level design.</p> <p><b>197.</b> Part 7.1 - This needs to be more specific and advise on what measures are mandatory or expected, and which are aspirational. It is not clear how to address this, or whether applicants would be penalised for not incorporating adequate adaptation measures.</p> <p><u>Parish and Town Councils</u></p> <p><b>198.</b> Adaptation to climate change should be changed to managed retreat.</p> <p><u>Local environmental organisations</u></p>	<p><b>196.</b> Noted, however the checklist is considered an important tool in allowing applicants to consider designing developments for maximum sustainability. Many of the details within it are deemed useful in setting out the measures that would be needed to achieve net zero development. There is not considered to be enough value in a more high level approach given the urgency of the climate emergency.</p> <p><b>197, 199, 200, 201.</b> Overheating is referred to in section 1 of the checklist. <b>However, these measures will be added into the adaptation of the checklist as prompts.</b> Applicants will not be ‘penalised’ for not including such measures unless they are required by existing policy – such as sustainable drainage systems for example.</p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>199. It doesn't ask any questions targeted to specific measures of adaptation to climate change.</p> <p>200. Suggest that section 7.1 asks questions about the existence of specific adaptations to climate change and sets some standards.</p> <p>201. Section seems weak, given that Environmental Resilience is one of the three pillars on which the Planning for Climate Change is based. Lack of examples of measures e.g. against heat (shutters, awnings, shading, cross-ventilation, night-time ventilation, surrounding vegetation).</p>	<p>198. Adaptation is wider than managed retreat, which is one option in dealing with rising sea levels.</p>
<p><b>Scope of the checklist</b></p>	
<p><u>Developers/agents, public response</u></p> <p>202. Concerned that locational sustainability is not being factored into the assessment.</p> <p><u>Developers/agents</u></p> <p>203. Concerned that by focusing on the contribution proposals make towards net zero as demonstrated by a Sustainability Statement, the SPD could be providing a route for development in unsustainable locations to gain planning permission.</p> <p><u>Woodland Trust</u></p> <p>204. The checklist should include due regard to biodiversity and the protection of irreplaceable habitats as according to the NPPF.</p> <p><u>Historic England</u></p> <p>205. Include a brief statement raising awareness of the fact that when altering or converting traditional buildings, different techniques and materials may be more appropriate.</p> <p>206. Traditional buildings are generally of solid wall construction with no integral moisture barriers, and include older houses (i.e. largely built before 1919).</p> <p>207. Guidance could cross reference to more detailed guidance on energy efficiency and retrofit of traditional buildings, including for example that provided on Historic England's website here: <a href="https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/</a>.</p> <p>208. Would welcome a stronger steer within the Council's statement towards reuse of existing buildings in appropriate circumstances - could also cross refer to the Council's draft guidance for listed buildings, in which a lot of the information is also relevant to (unlisted) historic and traditional buildings.</p> <p><u>CPRE, Parish and Town Councils, local environmental organisations</u></p> <p>209. Scope should be extended to cover placement/infrastructure/transport issues.</p> <p>210. Biodiversity and ecology elements should be included in the checklist – including net ecological gain.</p> <p>211. Misses a great opportunity to ensure that highly sensitive Biodiversity and ecology issues are considered and discussed early and openly in the planning process.</p> <p><u>CPRE</u></p> <p>212. No reference is made to availability of utilities such as sewage and electricity grid.</p> <p>213. No reference is made to availability of primary or emergency healthcare, or schools.</p> <p><u>CCAONB</u></p> <p>214. Incorporation of bird and bat boxes, together with bee bricks should be standard practice and included.</p> <p>215. There is no mention of the detrimental effect of Artificial Light at Night on flora and the reduction in carbon sequestration by photosynthesis.</p> <p>216. Lighting should be included, or it should be stated that a sustainable good lighting statement is required with each planning application.</p> <p><u>Local environmental organisations</u></p> <p>217. Need to include location of new development - Is this the optimum location in terms of minimising the need to travel, maximising access to local resources through active travel, access to public transport, internet access, etc.</p>	<p>202, 203, 209, 213, 217, 222, 225. Locational sustainability and access to infrastructure, whilst not covered by the checklist, remains a primary consideration when considering and assessing the sustainability of development, and is considered against the various adopted local plan policies which cover this issue.</p> <p>204, 210, 211, 225, 226. Whilst it is noted that biodiversity and ecology are key aspects in dealing with the climate emergency, these issues are considered to be well covered by existing policies, frameworks, and guidance. It is not considered appropriate to duplicate requirements. The council has recently published a <a href="#">Biodiversity Net Gain Guidance Note for Applicants and Agents</a> which provides information of how ecological issues will be considered. <b>Reference to this recent guidance document will be added to the checklist</b></p> <p>205, 206, 207, 208. <b>Noted. A brief statement will be added, with reference to other guidance.</b></p> <p>208. Noted. The checklist requires applicants to set out their justification for any demolition of buildings proposed. Setting out a stronger steer towards re-use of buildings is outside of the scope of the checklist, as it would be a matter to be dealt with through new policy.</p> <p>209, 221, 224. See above regarding locational sustainability. <b>An additional checklist question will be added covering public and active travel, which will ensure that smaller scale developments that may not require a Travel Plan consider sustainable transport.</b></p> <p>212. Availability of utilities is not considered to be a key issue when considering new development and climate change. It is expected that applicants will have confirmed access to utilities prior to making an application and this is covered in the standard application form.</p> <p>214, 215, 216, 233, 234. Specific impacts on ecology and features for protection and enhancement are considered to be well covered by ecological considerations, policies, and frameworks such as the biodiversity protocol. It is not considered appropriate to duplicate requirements.</p> <p>216, 232. Information on lighting and light pollution can be requested where appropriate and where it is considered a material consideration.</p> <p>218, 219, 220, 230, 231. For larger developments there is already a requirement to submit a Transport Statement/Travel plan that will cover these issues. It is not considered appropriate to duplicate requirements. <b>An additional checklist question will be added covering public and active travel, which will ensure that smaller scale developments that may not require a Travel Plan consider sustainable transport.</b></p> <p>223. Whilst this is noted, it is considered outside of the scope of the checklist.</p> <p>227. The checklist includes a section on maximising the use of sustainable materials and methods which includes provision of a schedule of materials and information on where they are locally produced.</p>

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p><b>218.</b> Will the development generate a net increase in motorised road traffic (including visitors) and how will this be mitigated against? How does the location help to maximise shared transport (especially freight)?</p> <p><b>219.</b> In the case of larger developments; what contribution will the developer make to investments in public transport, active travel, climate resilient infrastructure, impact minimisation (eg. carbon capture, rewilding), community energy development, etc. to ensure that the carbon impact is truly negative?</p> <p><b>220.</b> Suggest, for larger developments, there should be a logistics plan for the site to minimise the risk of pollution to air, land and water - should include managing any oil stored on site, identifying ways to reduce the volume of traffic to the site and an area to store materials so they are not damaged.</p> <p><b>221.</b> Should take into account access to public and active transport. Locations offering no genuine alternative to private cars should not benefit from being labelled as "sustainable developments".</p> <p><b>222.</b> Access to vital services (healthcare, schools, dentists) should be assessed and required locally.</p>	<p><b>228.</b> The overall planning assessment of sustainability of a development considers its economic, social and environmental sustainability. Therefore, to duplicate this in the checklist would be inappropriate.</p> <p><b>229, 242.</b> Such a requirement is already covered by Building Regulations (Part S).</p> <p><b>233.</b> This is outside the scope of the checklist.</p> <p><b>235.</b> The checklist and best practice objectives relate equally to all development levels, including self-build.</p>
<p><u>Local community organisations</u></p> <p><b>223.</b> Should not neglect to recognise that many new homes are of very small size, despite Building Regulation requirements fall short in meeting the access needs of people with disabilities (whether resident or visitor) and are not easily adaptable.</p> <p><b>224.</b> There should be a heading covering the availability of public transport to and from the site proposed for development (in the case of residential developments).</p>	<p><b>236.</b> The checklist as a whole will holistically cover these issues. <b>An amendment will be made to the introductory text to highlight the importance of site layout.</b></p>
<p><u>Public, local environmental organisations</u></p> <p><b>225.</b> Would like further targets to be set and the scope of the sustainability checklist to be increased to include other issues so that it is more ambitious - to cover placement/infrastructure/transport issues and environment/biodiversity/ecology issues otherwise it is incomplete and so of less value.</p> <p><b>226.</b> Ecological gain should be the priority when working with developers.</p>	
<p><u>Businesses</u></p> <p><b>227.</b> Primary sector industry such as stone quarrying should be prized as local suppliers to Dorset markets. The presence of these sources within Dorset means that heavy raw materials do not have to be imported over large distance. As a result, inherent self-sufficiency and sustainability is preserved for Dorset supply chains. These supplies should be valued highly in terms of the minimisation of GHGs.</p>	
<p><u>Public response</u></p> <p><b>228.</b> Development is only sustainable if all three components of sustainability are satisfied – need for economic, social and natural environmental issues to be considered.</p>	
<p><u>Parish and Town Councils</u></p> <p><b>229.</b> New builds must have electric car charging points.</p> <p><b>230.</b> Concern that transport is not included in the Sustainability Checklist - a key contributor to climate change.</p> <p><b>231.</b> Sustainable public transport is a key issue in the Wool, Bovington and East Burton area - the 'distance' between adopted local policies (Purbeck Local Plan, the Dorset Local Plan and Wool's Neighbourhood Plan) and the Local List could allow this vital aspect of managing Climate Change to slip through the net.</p> <p><b>232.</b> The checklist should also cover light pollution and access to green space.</p> <p><b>233.</b> The checklist should include reference to pollinators, bugs, sustaining natural systems. Include reference to Sites V2 Rating System document.</p> <p><b>234.</b> Refer to University of Sheffield Residential Landscape Sustainability feedback – a checklist tool (book), Bridport case studies, Landscape Institute for statements and documents (2020 Climate and Biodiversity Action Plan)</p> <p><b>235.</b> Include opportunities/information for self-builders.</p>	
<p><u>Dorset Council Cllrs</u></p> <p><b>236.</b> A further category could be included relating to the way a development or building sits within and utilises its site – enabling: ability to provide ground source heat pumps, building orientation (more south facing roofs),</p>	



Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p>establishing if there are suitable roofs available for PV not being used, using existing vegetation to help prevent over-heating, supporting good drainage as far as possible, arranging their parking spaces to maximise charge points.</p>	
<p><b>Accessibility and wording of the document</b></p>	
<p><u>Public response</u>  <b>237.</b> Concern with understanding of the technical and practical ramifications of this documents outline - it needs breaking down and extrapolating forwards to give a layperson a more realistic grasp of where this will take us.  <b>238.</b> Checklist should be called a "building efficiency checklist" as other issues of sustainability are not covered.  <b>239.</b> Wording needs to be more user friendly.</p> <p><u>Local environmental organisations</u>  <b>240.</b> Suggestion that the document is too vague.</p> <p><u>Local community organisations</u>  <b>241.</b> Maps should be provided (under many of the check list headings to illustrate what is being described)</p> <p><u>Parish and Town Councils</u>  <b>242.</b> This Sustainability Statement should be published and be in the public domain along with all the other currently required planning application documentation.</p>	<p><b>237.</b> The checklist is designed for use by applicants. It is considered that the text supporting the checklist itself explains the various elements.  <b>238.</b> The checklist is broader than 'building efficiency' and therefore renaming the document as suggested would be inappropriate.  <b>239. The council will review the wording to ensure maximum accessibility. Noting that some of the issues and measure are inherently technical.</b>  <b>240.</b> The checklist is as precise as possible however it cannot be prescriptive as it is not policy.  <b>241.</b> It is not clear how maps would relate to the content of the checklist.  <b>242.</b> Agreed. This is the intention.</p>

## Summary of issues raised and officer responses - Changes to paragraph 39 of the Local List

The consultation on the 'Changes to paragraph 39 of the Local List' drew comments from 51 responders in the online survey, with a number of additional responses received by email. In the online survey around 99 responses to the individual questions were received.

The consultation drew comments from a range of responder types. These included a range of local organisations mainly from the climate and energy sector and a broad geographical range of Town and Parish Councils. A number of developers and planning agents also responded, as well as a number of members of the public. The comments received are summarised below, alongside the Council's responses to the comments.

Issue raised or section of the Sustainability Checklist	Planning Policy team comments
<p><b>Principle of introducing a checklist</b></p> <p><u>Developers/agents</u></p> <ol style="list-style-type: none"> <li>1. There is no mention of the limitations of existing buildings until the last section.</li> <li>2. The sustainability checklist or statement can only include limited information at planning and would likely be considered a token gesture at the early stage, so it's odd to only require it for some development types and not all.</li> <li>3. A strategic checklist alongside the statement is generally painless, but developers, agents and applicants would need to also be provided with information on what achieves a 'passing' grade on this multiple choice - what ticks the box, and what isn't enough.</li> </ol> <p><u>Parish and Town Councils</u></p> <ol style="list-style-type: none"> <li>4. Useful tool that can also form the basis for introducing policies in neighbourhood plans that meet local needs.</li> </ol> <p><u>Local environmental organisations</u></p> <ol style="list-style-type: none"> <li>5. Clearly new development requires a more detailed and more sophisticated response.</li> <li>6. This is a good start but must be seen as a work in progress, not a job done.</li> </ol> <p><u>Public response</u></p> <ol style="list-style-type: none"> <li>7. Need to set very high threshold of acceptability.</li> </ol>	<ol style="list-style-type: none"> <li>1. Existing buildings are not covered unless there is a change of use, as stated in the proposed amended paragraph 39.</li> <li>2. Applicants are encouraged to include as much information as they can at planning stage. For smaller applications it is felt it would be too onerous to require a checklist, and to require information that is outside the scope of a proposal would be unreasonable.</li> <li>3, 7. The target standards presented are considered to be best practice objectives which applicants should aim for in order to contribute towards achieving net-zero development. The development will not achieve net-zero unless it addresses the measures in the checklist and there is decarbonisation of the electricity grid. Therefore, there is no 'passing grade' or 'threshold of acceptability', as this would be akin to new policy, which the checklist is not.</li> <li>4. Noted.</li> <li>5. Noted, it is intended that the level of information provided within a completed checklist will be proportionate to the scale of the proposed development.</li> <li>6. Noted. It is intended that new policy will be set out as part of the emerging local plan.</li> </ol>
<p><b>Status of the requirements in the checklist</b></p> <p><u>Public response</u></p> <ol style="list-style-type: none"> <li>8. Some parts should be made mandatory, rather than considered.</li> </ol>	<ol style="list-style-type: none"> <li>8. It is currently not possible to make certain parts of the checklist mandatory as they are not backed by adopted policies, It is intended that new policy will be set out as part of the emerging local plan.</li> </ol>
<p><b>Relevant development types</b></p> <p><u>Developers/agents</u></p> <ol style="list-style-type: none"> <li>9. Should apply to full applications only.</li> <li>10. Clarify what is meant by 'technical details consent' and whether this is a building control application.</li> <li>11. Following the review of this document in full it is concluded that minerals developments are outside of the scope of the Sustainability Checklist.</li> </ol> <p><u>Parish and Town Councils, Local environmental organisations, Dorset Council Cllrs, Public response</u></p> <ol style="list-style-type: none"> <li>12. The checklist requirement should apply to all development types.</li> </ol> <p><u>Parish and Town Councils</u></p> <ol style="list-style-type: none"> <li>13. The checklist requirement should apply to all new-builds.</li> </ol>	<ol style="list-style-type: none"> <li>9. Permission in principle and prior approval applications are exempt from preparing a checklist. A footnote will be added to clarify this. Outline applications are not exempt, however it is intended that the level of information provided within a completed checklist will be proportionate to the type of application and scale of the proposed development.</li> <li>10. Applications for Technical Details Consent are planning applications that follows grant of a Permission in Principle.</li> <li>11. Mineral planning is covered by the Minerals Strategy (2014) which includes a policy requiring the preparation of a climate change assessment for minerals applications (Policy CC1).</li> </ol>

<p>14. The checklist requirement should apply to self-builds.</p> <p>15. Query whether 'encouraging' householder applicants is firm enough?</p> <p>16. It should be mandatory for all types of development, even if it is accepted that in some cases of householder development (&lt;10%), the threshold expectations may be lower where a permitted justification is provided.</p> <p>17. It should also cover buildings associated with renewable energy infrastructure.</p> <p>18. Should the Sustainability Checklist be a requirement for all these categories which provide economic or community benefit i.e. new commercial, office, storage and distribution, retail, industrial, waste, community or leisure and educational development including extensions of over 10% additional gross internal floorspace?</p> <p>19. Would like to see this modified to exclude small business and community facility developments where the size of the development is small - need to encourage the growth of employment and for small businesses and community facility development compliance with the full checklist may be too onerous.</p> <p>20. For use in towns such as Dorchester it should be possible to provide a version of the sustainability checklist as a compulsory document for all housing developments of any size - including smaller developments typical of urban areas, changes of use, retrofitting, social housing, affordable housing, single domestic houses, and extensions.</p> <p><u>Public response</u></p> <p>21. Para 39, first bullet point – clarify if large-scale development proposals are covered elsewhere as these are the proposed developments that most need a sustainability analysis and statement.</p> <p>22. Include all but very small projects on private homes.</p> <p><u>Local environmental organisations</u></p> <p>23. When applying for permission to build a new extension, householders should be required to complete certain sections of the Sustainability checklist and to provide a statement on those sections. This would help to reduce Dorset's carbon emissions and raise general awareness of the need for climate change mitigation and adaptation.</p> <p>24. The questions directed at householders could perhaps be the ones that set standards that are likely to be most effective in reducing carbon emissions, yet are fairly straightforward to answer.</p> <p>25. All developments which come within the remit of planning, development control and buildings regulations approval should be required to submit an appropriate level of checklist – e.g. permitted development which is subject to buildings regulations approval should have to answer basic questions relating to materials used, design features appropriate for a warming/wetter climate, etc.</p> <p>26. A version of the sustainability checklist should be compulsory for all housing developments of any size including smaller developments, changes of use, retrofitting, social housing, affordable housing, single domestic houses, and extensions.</p> <p><u>Businesses</u></p> <p>27. Include large developments on agriculture land in rural areas where there will be substantial increases in car transport.</p> <p>28. Refurbishment of some buildings, e.g. churches, may require exemptions in order to retain their historic integrity.</p>	<p>12, 13, 15, 16, 20, 22, 25, 26, 27. For smaller applications (such as householder applications) it is felt it would be too onerous to require a checklist, and to require information that is outside the scope of a proposal would be unreasonable.</p> <p>14. The checklist requirement would apply to self-builds as this would be an application for a new dwelling.</p> <p>17. Such buildings may be subject to the checklist requirement, depending on their scale.</p> <p>18, 19. The checklist will be a requirement for relevant planning applications within the uses mentioned. It is not considered appropriate to specify specific uses that are applicable and those that aren't. It is intended that the level of information provided within a completed checklist will be proportionate to the scale of the proposed development.</p> <p>21, 27. Large scale development is covered by the requirement for a checklist and statement since it applies to any new residential and commercial.</p> <p>23, 24, 28. Applicants are encouraged to include as much information as they can at planning stage. For smaller applications (such as householder applications) it is felt it would be too onerous to require a checklist, and to require information that is outside the scope of a proposal would be unreasonable. Renovations are exempt.</p>
<p><b>Alternative approaches</b></p>	
<p><u>Developer/landowner/agent</u></p> <p>29. Some of the requests of this checklist could also easily be incorporated into the main planning application form as a few strategic questions, rather than needing to produce extra (wasteful) documentation alongside the application that cannot really be that informative based on a planning level design.</p>	<p>29. Setting questions within an application form is outside of the scope of the local authority. Application forms are designed nationally.</p>
<p><b>Additional issues that should be covered</b></p>	
<p><u>Public response</u></p> <p>30. A section should be added on conservation and enhancement of wildlife habitat with clearly stated links drawing attention to other policies within Local and Neighbourhood Plans.</p> <p><u>Parish and Town Councils</u></p> <p>31. We welcome the proposals for sustainable transport for all new build sites with links to active transport and bus routes.</p>	<p>30. The council's Biodiversity Protocol already exists (with other requirements set out in the local list) to cover issues such as conservation and enhancement of wildlife habitat.</p> <p>31. Noted.</p>