

Comment reference	Respondent / agent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to SPD
	Barratt West Midlands - Savills		At numerous points within the SPD, the document makes reference to the Government’s emerging Future Homes Standards. However, as the standards have not been implemented, the document does not require future developments to accord with the proposed standards that have previously been consulted on. Barratt support this and request that where the SPD makes reference to developments complying with the Future Homes Standard in the future, this will be subject to viability.	Agreed.	Where references have been made to developments complying with the Future Homes Standard in the future, insert the words ‘subject to viability’.
	Barratt West Midlands - Savills	Para 4.9	This para sets out that new builds must meet the requirements of Building Regulations Part L. The paragraph goes on to state that <i>“the majority of local authorities in England have made their planning policies more ambitious by requiring a 19% improvement beyond Part L 2013”</i> . These requirements are considered to be over and above the requirements of the Planning Practice Guidance (‘PPG’) which states that Local Plans <i>“can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes”</i> (Reference ID: 6-012-20190315). The PPG also states that if a Council is <i>“considering policies on local requirements for the sustainability of other buildings, local planning authorities will wish to consider if there are nationally described standards and the impact on viability of development”</i> (Reference ID: 6- 009-20150327)	The figures quoted in this para are known facts and it is for individual LPAs to pursue an appropriate policy approach. The references merely illustrate that policy options exist and this para sets the context for what can be achieved through DPDs.	Insert the following words at the end of last sentence to para 4.9 to read: ‘through their Development Plan Document (DPD) process. However, this cannot be achieved through a SPD as it involves the introduction of a specific policy approach’.
	Barratt West Midlands - Savills	Para 4.10	Paragraph 4.10 goes on to state estimated costs for a ‘fabric first approach’ to energy efficiency. No viability	The figures quoted in this para are suggested	Delete the second sentence from para 4.10.

			<p>appraisal is being consulted on to support the proposed SPD requirements or figures stated in paragraph 4.10. The PPG states that SPDs should build upon policies in a local plan but “<i>they should not add unnecessarily to financial burdens on development</i>” (Reference ID: 61-008-20190315). The SPD has not provided justification as to why the standards above national requirements are being sought and its impact on the viability of sites.</p>	<p>approximate costs based on the figures quoted by the UKGBC. They are not SPD requirements, however, it is recognised that these figures are not up-to-date.</p>	
	Barratt West Midlands - Savills	Para 4.14	<p>Paragraph 4.14 states that when undertaking modelling, applicants are strongly encouraged to use the SAP 10 emission factors as these reflect current, real-world emissions much more closely than the SAP 2012 emission factors. The SAP 10 have not be adopted nationally as of yet. We therefore consider that the national guidance should be followed to ensure consistency across sites.</p>	<p>Agreed.</p>	<p>Reword para 4.14 as follows: ‘When undertaking modelling, applicants are strongly encouraged to use the national guidance SAP 2012 emission factors (or any future replacement equivalent). The energy statement should state clearly which emission factors have been used.</p>
	Barratt West Midlands - Savills	Para’s 4.17-4.21	<p>Paragraphs 4.17 – 4.21 sets out the West Midlands Combined Authority (‘WMCA’) support for zero carbon homes and their objectives to assist in meeting their target for the region to be net zero by 2041. The SPD does not state that future development needs to accord with this standard. However, it is considered that the SPD should specifically state that the WMCA’s objectives are not planning policy so no weight will be given to them in the decision-making process.</p>	<p>These para’s merely aim to provide a regional policy context through the work of the WMCA. It is not the aim of the SPD to express a view regarding the way in which said policy documents can be given weight or otherwise.</p>	<p>No change.</p>
	Barratt West Midlands - Savills	Para’s 5.53 – 5.60	<p>There are a few paragraphs within the SPD where Barratt consider that ‘where possible’ should be added in order to provide further flexibility for developers. The</p>	<p>Agreed.</p>	<p>Paragraph 5.53 – insert the words “<i>Where possible</i>” before the first sentence.</p>

			<p>paragraphs and proposed additions (underlined&gt; are as follows:</p> <ul style="list-style-type: none"> <li>- Paragraph 5.53 (first sentence) – <i>“Where possible, buildings should be deigned from the outset to be flexible to accommodate changing needs”</i>.</li> <li>- Paragraph 5.56 (9th bullet point) – <i>“Buildings should be designed for passive ventilation where possible...”</i>.</li> <li>- Paragraph 5.60 (first sentence) – <i>“Where dwellings or commercial units are sold or leased fully fitted/furnished, where possible, low energy appliances should be provided in order to reduce the energy used by building occupants”</i>.</li> </ul>		<p>Paragraph 5.56 - insert the words <i>“where possible”</i> at the end of the 9th bullet point.</p> <p>Paragraph 5.60 – insert the words ‘where possible’ at the end of the first sentence.</p>
	Barratt West Midlands - Savills	Para’s 5.12 and 5.14	<p>Paragraphs 5.12 and 5.14 reference development sites being within ‘the vicinity’ of an existing heat network. Further clarity is requested on how the Council will determine ‘the vicinity’. It may be beneficial to provide a plan in the SPD to show areas which the Council consider are within ‘the vicinity’ of a heat network.</p>	<p>It is expected such matters to be determined by prospective applicants in discussion with the Council on a case by case basis rather than the SPD providing an arbitrary distance threshold as it is considered this would represent a more pragmatic, flexible and reasonable approach for all parties.</p>	<p>Add a new footnote in para’s 5.12 and 5.14 after the word ‘vicinity’ to read ‘It is expected such matters to be determined by the applicants in discussion with the Council on a case by case basis’.</p>
	Barratt West Midlands - Savills	Para 5.44	<p>Paragraph 5.44 states that the Council has an aspiration for zero carbon development and this will be ‘strongly encouraged’. Barratt is committed towards reducing carbon emissions and it is their position that all of their new homes will be zero carbon from 2030. We therefore</p>	<p>Noted.</p>	<p>No change.</p>

			support the Council's aspiration to encourage zero carbon development where possible.		
	Barratt West Midlands - Savills	Para 5.67	Paragraph 5.67 of the SPD sets out the measures Sustainability Statements should provide details on where there is a 'performance gap' in the carbon and energy performance of buildings when built compared to anticipated at the design stage. Barratt consider that the below should only be met where possible i.e. third party processes may not be used and post construction testing on a specific development will not necessarily be undertaken unless required by legislation or planning conditions/obligations. Equally previous developments should not affect the processing/determination of current applications.	Comments noted, but the para does make clear that such suggestions and not mandatory requirements with the operative word being 'could' not 'should'.	No change.
	Barratt West Midlands - Savills	Figures 7, 8 and 9	It is considered that any figures within the SPD should represent the average house being / expected to be delivered in Coventry. Figures 7, 8 and 9 are not considered to be representative.	The Council takes an ambitious and innovative forward thinking approach to tackling energy challenges through planning and figures 7, 8 and 9 are entirely deliverable in the Coventry context.	No change.
	Historic England		Heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation, rather than a constraint, and we consider that the SPD should reference the retention and re-use of buildings, as at present the SPD only relates to new development. We consider that the document should recognise sustainability over the long-term. Historic	Agreed.	Insert a new numeric point after the third point in para 5.38 to read: 'Heritage assets: assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and

			<p>buildings represent a significant investment of expended energy and demolishing and replacing them requires a major reinvestment of embodied energy and other resources. The SPD should therefore encourage and recognise the benefits of sympathetic restoration, retention, refurbishment and retrofitting of historic buildings. Furthermore, we consider that policies and guidance should adopt a 'whole building' approach; looking firstly at a building's current environmental performance, then considering non-invasive measures and lastly physical interventions. Explicit reference should be made to the distinction between historic and modern fabric, as these cannot be treated in the same way; standardised methods are often inappropriate and will not only adversely affect the character and appearance of historic buildings and areas, but can easily reduce the performance of those buildings, and result in maladaptation (using more carbon to install and operate the measures than they can save). Such measures can have other unintended consequences for building use, such as poor indoor air quality, and "rebound" effects, which can make buildings less thermally efficient.</p>		<p>adaptation, rather than a constraint. Further information can be found through the following link: <a href="https://historicengland.org.uk/">https://historicengland.org.uk/</a></p>
	National Highways		<p>Having reviewed the SPD with regards to the interests of National Highways, our network and assets, we can advise that we are supportive of the guidance and have no further comments to make.</p>	Noted.	No change.
	Persimmon Homes – Pegasus Group	Para 2.1	<p>The introductory paragraph (2.1) helpfully confirms that an SPD cannot include any new policies that do not currently form part of the Local Plan and that an SPD itself does not form part of the Local Plan. The paragraph continues that SPDs are a 'key' consideration in the determination of</p>	Agreed.	Delete the words 'However, it is a key consideration' from the second sentence of para 2.1 and replace with the following:

			planning applications. This should be amended to confirm they are another ' <i>material</i> ' consideration.		'SPDs are an important material consideration.....'
	Persimmon Homes – Pegasus Group	Para 2.2	Under 'aims and objectives' it reiterates that the SPD cannot introduce new targets or standards beyond those already set out in the adopted Local Plan. The final bullet point states that the SPD may ' <i>encourage</i> ' developers to go further than current policy to demonstrate excellence in sustainable development. It should be made explicitly clear that this is not a requirement.	The fact that the final bullet point starts with the word 'encouraging' infers that it is not a requirement.	No change.
	Persimmon Homes – Pegasus Group	Section 4	Section 4 of the document sets out the policy context for the SPD, considering national, regional and local policy. The national policy context makes reference to the Future Homes Standard and Building Regulations. It should be clarified that these are covered by a separate regulatory regime and the planning system should not seek to duplicate matters already addressed by separate regimes.	Agreed.	Insert a new para after 4.16 to read: 'The Future Homes Standard and Building Regulations are covered by a separate regulatory regime and the planning system should not seek to duplicate matters already addressed by separate regimes'.
	Persimmon Homes – Pegasus Group	Table 1	Table 1 sets out current codes and standards applicable in England (BREEAM, Home Quality Mark, Passivhaus and Standard Assessment Procedure). The preceding paragraph confirms these are voluntary standard and can only be required through specific Local Plan policies rather than SPDs. Therefore, planning applications should not be assessed against these standards unless adopted policy requires it. In terms of the regional policy context, it is important that the SPD acknowledge that the West Midlands Combined Authority does not have planning powers. The documents referenced may set out aspirations and targets but in terms of delivery and how this is achieved through the planning system will be left to local councils to set out in Local Plans.	Comments noted. The said table at no point infers that these codes and standards will be applied to planning applications in Coventry. It is included to show the breadth and depth of the national context.	No change.

	Persimmon Homes – Pegasus Group	Section 5	Section five addresses energy requirements in Coventry. In terms of Energy Statements, this comes through the local validation checklist rather than the Local Plan which requires a Sustainability Statement. In practice there is likely to be a high degree of overlap between these documents, and other application documents such as Design and Access Statement. The SPD should recognise the need for flexibility in the format of these documents and that in some cases these will be best addressed by a single document.	The approach set out is to allow a consistency of approach in respect of the local validation requirements in order to ensure there is a joined up approach to the way in which local requirements and SPD standards are considered through the planning process.	No change.
	Persimmon Homes – Pegasus Group	Para 5.3	This sets out that Energy Statements should show how reductions in carbon emissions will be achieved, how each action/proposal will contribute to the total reduction in carbon emissions per dwellings, the approach to the energy hierarchy and the name and position of the person producing the Statement. Persimmon Homes' construction specification is tailored to meet customer expectations for energy efficient homes with low operating costs and user-friendly technologies. On previous schemes in the City, Persimmon Homes has provided details of energy efficiency measures and energy efficiency calculations to demonstrate that calculated fabric energy efficiency exceeds the requirements of the target fabric energy efficiency. It should be acknowledged by the SPD that on large-scale residential developments details and calculations will be provided for each proposed house type rather than on a per dwelling basis. It should also be acknowledged that the Statement structure suggested by the SPD will not be suitable for outline applications.	Agreed.	Add the following bullet points to para 5.3 to read: <ul style="list-style-type: none"> <li>- large-scale residential developments details and calculations will be provided for each proposed house type rather than on a per dwelling basis.</li> <li>- the Statement structure will not be suitable for outline applications as these proposals are high-level in nature and set out an overall energy strategy for the site with further details, such as carbon reduction calculations by house type, to be provided at detailed approval stage (usually reserved matters).</li> </ul>

			Statements for outline applications will by necessity be high-level in nature and set out an overall energy strategy for the site with further details, such as carbon reduction calculations by house type, to be provided at detailed approval stage (usually reserved matters).		
	Persimmon Homes – Pegasus Group	Para 5.5	This sets out a structure for Energy Statements. This includes consideration of heat networks and/or Combined Cooling Heating and Power, appraisal of energy technologies and carbon reduction calculations. This is not supported by the Local Plan policy EM2 and goes beyond the requirements of the Local Plan. Policy EM2 clearly states that new development should meet relevant Building Regulations as a minimum. Compliance with the Building Regulations is therefore the benchmark against which development proposals should be assessed. Where it is demonstrated that proposals can comply with these requirements through energy efficient specifications then there is no policy requirement to carry out an appraisal of energy technologies or heat networks. Indeed, the adopted Plan only makes reference to heat and power generation in supporting text (not policy) and only in relation to identified strategic sites. The SPD seeks to go beyond the adopted policy and the requirements, for example that developments within the area of an existing network must be connection-ready as a minimum. These additional points could have significant implications for the viability of proposed development and this should therefore be considered, evidenced and viability-tested through a Local Plan and not an SPD. This should be deleted from the SPD. Figure 3 sets out the existing heatline network in Coventry. The network is currently	The approach in para 5.5 makes it clear it is a 'suggested' approach for energy statements. The proceeding paragraphs of the SPD then set out what is expected to be considered against the 'suggested' structure. Importantly, the 'suggested' structure clarifies and amplifies Local Plan policy EM2 by specifically addressing point 2 of the policy by providing further detail as to what the Council would expect from developments and to be designed in accordance with the specified energy hierarchy in meeting the carbon reduction targets set out in Building	Delete the words 'must consider' and replace with 'are expected to consider' in para 5.5.

			<p>limited in extent and the majority of proposals within the City will not be able to connect to this. It would assist if this Figure were kept up-to-date and were continuously updated if the network is expanded. In terms of low and zero carbon energy, as set out above Policy EM2 is benchmarked against Building Regulations and encourages the use of energy efficiency and low carbon energy to achieve this, along with other methods such as conserving water, materials and recycling. It does not have any specific requirements regarding low carbon energy nor does it express a preference for one method over any others. It does not require that development proposals should demonstrate that the most effective technology or mix of technologies has been selected or that all methods should be considered. Requiring an appraisal of each low carbon technology is unnecessarily onerous and goes beyond demonstrating compliance with adopted policy. The SPD should not be introducing these requirements as, if a proposal can demonstrate compliance with the relevant policy, than under the plan-led system it is acceptable. This should be removed from the SPD.</p>	<p>Regulations. Therefore, it is suggested that it is for individual planning application submissions to show they meet the requirements of Policy EM2 informed by the details set out in this section of the SPD.</p>	
	Persimmon Homes – Pegasus Group	Para 5.27	<p>This para seeks for Energy Statements to assess the carbon saving potential of energy technologies using real-world performance and take into account the future decarbonisation of the national grid rather than relying on the emission factors used in the Building Control system. It is not clear that this information is available to applicants and the SPD should clarify where and how this can be obtained. This approach is not supported, and it is not clear how schemes would be assessed on a consistent</p>	<p>Para 5.27 has been included because the reliance on the emission factors used in the Building Control system are understood to be updated infrequently. The SPD can not and should not provide all the answers for</p>	No change.

			<p>basis, as is possible when using the emission factors from the Building Control system.</p>	<p>prospective applicants as it is considered this could stifle innovation. Moreover, it is considered that it is for applicants to provide the necessary appraisal and each case will be considered on a case by case basis.</p>	
		<p>Para 5.28</p>	<p>This para states that where schemes propose a mix of renewable energy technologies they will need to demonstrate how they will work in tandem and, where applicable, how they will be integrated into a heat network or cooling system. The SPD should be careful not to place additional requirements on schemes proposing multiple forms of renewable energy technologies at the risk of inadvertently discouraging this approach. In terms of Sustainability Statements, this is included in Policy EM2. As set out above, this Statement will have a high degree of overlap with other submitted documents including, but not limited to the Energy Statement, Design and Access Statement and drainage information. If a separate document it to be submitted it would likely include a significant amount of cross-referencing to these other documents rather than repeating the same information. For example, the sections concerned with site layout, landscaping and urban form (paragraphs 5.47 – 5.52), building design (5.53 – 5.61) and Building for Life (5.62 – 5.64) are all likely to be addressed in a Design and Access Statement.</p>	<p>It is considered appropriate and reasonable for prospective applications to include all necessary information in whatever document applicants consider is appropriate. It is considered that it is not the role of an SPD to specify what type of information is included in a particular document that would be required as part of a planning application submission, rather this para provides further detail as to what could</p>	<p>No change.</p>

				be considered a reasonable approach.	
	Persimmon Homes – Pegasus Group	Para 5.44	This section states that zero carbon developments are strongly encouraged wherever possible. There is no reference in the adopted Local Plan to achieving zero carbon development, there is no policy requirement to support this and this would need to be carefully viability tested through the Local Plan process. The SPD should be clear that proposals cannot be assessed against zero carbon standards as this is not a policy requirement.	The SPD makes it clear in this para that zero carbon developments are ‘encouraged’ so by its very inclusion, the reader should acknowledge it is not a requirement. The SPD therefore aims to clarify and provide further detail as to the policy approach set out in Policy EM2 by using terminology that is now universally accepted as part of the narrative surrounding building standards.	No change.
	Persimmon Homes – Pegasus Group	Para 5.65	The section regarding the ‘performance gap’ is speculative on what may cause this. Should the Building Regulations be amended to require new buildings to be tested against their design specification after construction this will be done through Building Regulations rather than the planning system which should not duplicate requirements of other regulatory systems. There is no policy requirement for measures to addresses the performance gap and as such the SPD cannot require this or assess applications against this. Any information submitted on this should be treated as exceeding policy.	This is a general point that can reasonably be made in the context of this part of the SPD given it is qualified by a third party source and so it is considered relevant and appropriate to make the point as context for the proceeding paragraph.	No change.

	Richborough Estates – Marrons Planning	Para 5.7	This para states there is a requirement for developments to connect to CHP networks where they exist, although that requirement does not appear in Policy EM2.	The approach in para 5.7 makes it clear that Local Plan policy EM2 specifically addresses the way in which heat networks can be considered as part of point 2 of the policy by providing further detail as to what the Council would expect from developments and to be designed in accordance with the specified energy hierarchy in meeting the carbon reduction targets set out in Building Regulations. Therefore, it is suggested that it is for individual planning application submissions to show they meet the requirements of Policy EM2 informed by the details set out in this section of the SPD. It is already acknowledged that there is no policy requirement to connect to existing or planned	Delete the second sentence of para 5.7.
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				decentralised energy networks.	
	Richborough Estates – Marrons Planning	Para 5.11	This para states that all new developments must demonstrate how the objectives of policies (EM2 and EM3) have been met through alternative equivalent carbon solution in the Sustainable Buildings Statement. That requirement does not appear in Policy EM2.	The SPD provides further detail and amplifies how policy EM2 and the supporting text should be interpreted. Given this, both policy EM2 and supporting text both specifically address sustainable building statements and encouragement to connect to existing and planned decentralised energy networks.	No change.
	Richborough Estates – Marrons Planning	Para 5.38	This para sets out a list of matters that the Sustainability Statement must address in order to demonstrate the proposals comply with the Local Plan, and other SPDS. However, this list sets requirements for development which go beyond Policy EM2 in so far as: <ul style="list-style-type: none"> <li>• incorporation of a proportion of recycled and/or secondary aggregates;</li> <li>• the Council’s strong support for zero carbon development;</li> <li>• performing positively against Building for Life guidance;</li> <li>• compliance with the highest national standards of water efficiency, which for residential developments of one or more gross units means achieving a water efficiency standard of a maximum of 110 litres per occupant per day.</li> </ul>	It is considered this para provides a relevant and up-to-date approach to what a sustainability statement should consider based on policy EM2 and the Councils local validation requirements in order to provide a robust approach. Given that sustainability statements do not cover compliance with the	Delete the words ‘must address’ and replace with ‘is expected to consider’ from the second sentence of para 5.38.

			<p>It is not clear whether the above list taken from paragraph 5.38 is seeking to set standards for new development, or whether these are aspirations which developers are encouraged to achieve.</p> <p>This SPD cannot be used to update the Local Plan policies, and it is requested that paragraphs 5.7, 5.11 and 5.38 of the Draft SPD are amended before it is adopted to clarify these are not requirements on new development.</p>	carbon emission and low and zero carbon energy requirements as compliance with these requirements is established through energy statements, it is considered this para provides the necessary guidance and steer as to what is encouraged in the Coventry context.	
	Severn Trent Water	Para 5.38	We are supportive of your plan in particular paragraph 5.38 on 'What do sustainability statements need to cover?'. We are supportive of section 2g relating to water efficiency measures and section 3 relating to SuDS.	Noted.	No change.
	University of Warwick	Para 5.9	We support the change from support for CHP led heat networks to low carbon networks in general, and recognise that heat networks are a central part of the UK governments net zero strategy. We would go further to support low carbon development whether on a network or not. As heating transitions to heat pump technology we are developing flexible strategies and solutions to optimise their impact.	Noted.	No change.
		Para 5.19	There is an assertion that low carbon CHP engines are still "low carbon". This contradicts BEIS' recent work and industry standards. The new Building Regulations will show that a gas CHP, (even excluding network losses) is higher carbon than a gas-fired boiler and mains electricity. The university is committed to decommissioning its CHP plant as set out in the Net Zero Carbon strategy. There is an	Comments noted.	No change.

			assertion that as CHP engine also provides cooling the efficiency increases. A CHP engine can normally only provide cooling if heat is fed to an absorption chiller. These normally have a co-efficient of performance (CoP) of 1.2 to 1.4. This compares to an electric chiller that would typically provide cooling at a CoP of 3 to 6. Therefore, although it may be able to show that CCHP is more efficient than CHP alone, it is far more efficient to use electric chillers or heat pumps. (You suggest this in 5.30.) The university will be decommissioning its absorption chiller plant aligned with the CHP strategy, and develop low carbon technologies for cooling.		
	University of Warwick	Para 5.20	Biomass CHP is very rare, but if it is used we support the council's concerns around air pollution. We are aiming to reduce all air pollution on our campus and support wider efforts by others. The air pollution from gas and biomass CHP engines is very high compared to gas boilers. The university will continue to 'horizon scan' the opportunities for biofuels and their potential as part of its 'energy mix	Comments noted.	No change.
	University of Warwick	Para's 5.11-5.22	We suggest that the focus on CHP and heat networks is adjusted. Industry and regulation is fast moving to accept that heat pumps will be the source of low temperature heat for buildings, including the Climate Change Committee. Most pertinently, from 2025 the UK government has already confirmed that fossil fuels will not be allowed for new buildings. The university strategy set out in the Net Zero Carbon Pathway document sets out a transition path which removes the reliance on fossil fuel and promotes low carbon technologies, such as ground source heat pumps, air source heat pumps and increased	It is maintained that decentralised heat networks contribute to the mix of technologies that can provide sustainable energy going forward, particularly in the Coventry context. However, it is accepted that other sources of	Add a new para after 5.22 to read: 'Industry and regulation is fast moving to accept that heat pumps will be the source of low temperature heat for buildings, including the Climate Change Committee. Most pertinently, from 2025 the UK government has already confirmed that fossil fuels will not be allowed for new buildings. Given this, the promotion of suitable low carbon

			thermal storage. Our Environmental Sustainability and Energy Strategy gives more details.	sustainable energy can contribute to the mix.	technologies, such as ground source heat pumps, air source heat pumps and increased thermal storage will be encouraged wherever possible'.
	University of Warwick	Para 5.27	We support the requirement to consider the real-world performance of technologies and decarbonisation of the grid.	Noted.	No change.
	University of Warwick	Para 5.31	We support your point around heating systems with heat pumps operating better at lower flow temperatures. You suggest using underfloor heating or larger radiators to enable this. It would be beneficial to be explicit that you expect heating systems to operate at lower flow temperatures, no higher than 55 degrees, improving heat pump performance. The university recognises the need to improve the thermal performance of building stock, adapting passive measure for energy reduction. Improved thermal performance will improve the efficiency and suitability of low temperature, and low carbon heating technologies such as heat pumps.	Agreed.	Add new sentence at the end of para 5.31 to read: 'There is an expectation that heating systems need to operate at lower flow temperatures, no higher than 55 degrees to help ensure an improved heat pump performance, as it is recognised the need to improve the thermal performance of building stock and adapting passive measures for energy reduction'.
	University of Warwick	Para 5.38	Climate Change Adaptation – Referring to resilience to climate change, we suggest requesting the use of the Good Homes Alliance's Overheating tool as a simple way to assess risk for new residential development.	Agreed.	Add a new point after 3 j) to read: 'k. the use of the Good Homes Alliance's Overheating tool as a simple way to assess risk for new residential development'.
	University of Warwick	Para 5.43	On the offsetting subject, many local authorities are setting up funds that developers pay. The benefit of this is that it ensures activity is happening within the council area. It would also open up the opportunity for local providers to offer solutions. In regard to the creation of a local authority fund it is crucial that there is transparency as to	Comments noted. This will be explored further through the Local Plan review process as SPD can't introduce new	No change.

			the projects funded and that the results show a demonstrable carbon saving. There should also be options available for the developer to offset onsite/offsite or via a local authority fund. A mechanism could be put in place to ensure the fund demonstrates the carbon offsetting results within 3 years and in the case that this is not achieved the funds revert to the developer to use for carbon reduction projects on or off site.	policy approaches and mechanisms.	
	University of Warwick	Para 5.44	You state a preference for zero carbon development. It would be helpful to refer to standards and documents from organisations such as LETI and UKGBC.	Agreed.	Add a new footnote to the end of the second sentence of para 5.44 to the relevant website links for LETI and UKGBC.
	University of Warwick	Para 5.52	It is positive to see discussion of tree planting and microclimate principles.	Noted.	No change.
	University of Warwick	Para 5.53	We support the need for buildings to be flexible and adaptable, especially student accommodation, recognising the changing nature of our towns and cities with technology and the impact of Covid-19.	Noted.	No change.
	University of Warwick	Para 5.62	Building for Life 12 has been replaced by Building for a Healthy Life (2020 Edition). It is suggested this reference is updated.	Agreed.	Insert the words 'a healthy' after the word 'life' in the subtitle and all proceeding references in para 5.62.
	University of Warwick	Para 5.67	The performance gap is a significant issue, and we support aims to reduce it. Setting up a voluntary reporting structure for in-use performance would enable collection of data to identify the gap and how to close it.	Noted.	No change.
	University of Warwick	Comments on areas not contained in the SPD	<b>Smart Energy</b> - One area not addressed greatly in the SPD is that of smart energy management. We are increasingly electrifying transport and heat. This is happening in parallel with an electrical supply system increasingly dependent on intermittent or inflexible wind, solar and nuclear power.	Agreed.	Insert two new para's after para 5.67 to read:  Smart Energy

			<p>This has made the flexible use of electricity crucial in our transition to a zero carbon country. By switching demands, such as chillers, hot water and EV charging, on and off a building can reduce CO2 emissions, peak demand and energy bills, whilst allowing more renewable energy to be deployed and less fossil fuel power. Energy storage is an important part of this, in the form of hot water, building fabric and electro-chemical storage. We recommend the SPD makes a specific requirement to employ measures to support smart energy management, beyond smart meters. The university recognises the need to transition towards a Smart Local Energy System, developing a fully integrated and multi-vectoral energy system. This strategy is currently in development at a campus level. The ‘Smart Campus’ will be controlled and managed to provide dynamic and real-time optimisation of its power, heating, cooling, transport, renewable energy and storage systems. This will be fully integrated into associated energy management and maintenance operational activities.</p> <p><b>Electric Vehicles</b> - On a similar note, as vehicles electrify they will increasingly play a role in building energy systems. This is because the charging infrastructure often comes from the buildings, but also vehicle to grid and vehicle to building technology will mean that they will act as large energy storage devices, reducing energy bills and balancing supply and demand on the network. We recommend the SPD addresses this specifically.</p>		<p>5.68 Many organisations across the city are currently electrifying their transport and heat requirements. This is happening in parallel with an electrical supply system increasingly dependent on intermittent or inflexible wind, solar and nuclear power. This has made the flexible use of electricity crucial in our transition to a zero carbon country. By switching demands, such as chillers, hot water and EV charging, on and off a building can reduce CO2 emissions, peak demand and energy bills, whilst allowing more renewable energy to be deployed and less fossil fuel power. Energy storage is an important part of this, in the form of hot water, building fabric and electro-chemical storage. These examples of smart energy practices are encouraged to be considered, wherever possible.</p> <p>Electric Vehicles                      5.69 as vehicles electrify they will increasingly play a role in building energy systems. This is because the charging infrastructure often</p>
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					comes from the buildings, but also vehicle to grid and vehicle to building technology will mean that they will act as large energy storage devices, reducing energy bills and balancing supply and demand on the network. This approach to electrification is encouraged to be considered, wherever possible.
	Birmingham Airport Ltd.	General point	<p>Aerodrome Safeguarding Considerations: Birmingham Airport is an officially safeguarded aerodrome and therefore afforded safeguarding protection by UK Government (<i>Department for Transport</i>) to ensure its operation and development is not inhibited by proposed development and development plans. Aerodrome safeguarding covers but is not limited to:</p> <ul style="list-style-type: none"> <li>• Protecting the airspace around an aerodrome to ensure no buildings or structures cause danger to aircraft, either in the air or on the ground. This is achieved through both the 'Obstacle Limitation Surfaces' (OLS) and the 'Instrument Flight Procedure' (IFP) protected surfaces.</li> <li>• Protecting the integrity of Safety Critical Equipment used for Air Traffic Management, this is done by carrying out Physical and Spectrum Safeguarding of: radio equipment, communication and working practices including the use of portable management radio sets, Radar, instrument landing systems and other electronic aids to navigation (<i>technical safeguarding</i>).</li> </ul>	Comments noted.	No change.

			<ul style="list-style-type: none"> <li>• Preventing confusion of lights with Aeronautical Lighting, such as approach and runway lighting.</li> <li>• Minimising bird activity which poses a serious threat to flight safety and any increased wildlife strike risk.</li> <li>• Continued safe aerodrome operation from interference by any planned construction or construction processes (e.g. dust/smoke, temporary lighting or construction equipment etc.).</li> <li>• All use of cranes or any other tall construction equipment.</li> <li>• Protecting aircraft from the risk of collision with obstacles.</li> <li>• Any potential to distract pilots and air traffic controllers e.g. lighting, pyrotechnics, lasers etc. that can be seen by pilots on take-off and landing or in view of the Air Traffic Control tower.</li> <li>• Impact of installation of solar farms and wind turbines.</li> </ul> <p>Birmingham Airport should be consulted on any planned development that may impact aerodrome safeguarding.</p>		
	Coventry Society	General point	<p>The policy associated with this SPD is particularly weak, requiring nothing more than compliance with the Building Regs "as a minimum". As developments are required to meet the Building Regs anyway, it is clear that the policy lacks ambition. Having said that, the Society feels that the SPD makes a positive contribution to the aim of creating sustainable development in the city. The SPD sets out the requirement for meeting both the requirements of the policy but also, perhaps more importantly, other legislation and Government policy and it includes a very comprehensive description of current standards,</p>	<p>The policy to which this SPD is based may be subject to the Local Plan Review process.</p>	<p>No change.</p>

			certifications etc. The Society welcomes and supports this draft Supplementary Planning Document.		
	Ministry of Defence	General Point	Where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. Where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more. In summary, the MOD have no concerns or suggested amendments to the current draft of Coventry City Council's Energy Supplementary Planning	Comments noted.	No change.

			Document that forms the subject of the current consultation.		
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**SEA Screening Opinion responses**

Comment reference	Respondent / agent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to SPD
	Historic England	SEA Screening Opinion	With regard to the Energy SPD SEA Screening Opinion, in terms of Historic England’s area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within the adopted Coventry City Council Local Plan which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority’s conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. However, the views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made.	Agreed.	No change.

	Natural England	SEA Screening Opinion	It is our advice, on the basis of the material supplied with the consultations, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plans. Natural England therefore agrees with your conclusions that an SEA is not required for the separate SPD's.	Agreed.	No change.
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