



Campaign to Protect  
Rural England  
LONDON

# Sustainable Design and Construction Draft Supplementary Planning Guidance

A CPRE London response

May 2005

***Sustainable Design and Construction***  
**Draft Supplementary Planning Guidance**  
**March 2005**

**A response by CPRE London**  
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**Introduction**

1. CPRE London welcomes the publication of Draft Supplementary Planning Guidance on Sustainable Design and Construction and looks forward to seeing implementation of this Guidance across London.
2. We agree with the London Sustainable Development Commission's comment in the foreword that while this kind of site specific checklist is necessary, wider considerations of the impacts of developments is needed to make them fully sustainable. For example, the scale of demand on resources and resource availability (especially for water and energy), transport use and strategic land use considerations. We hope that these considerations can be included in the final SPG.
3. We welcome the LDA's work (page 7) on developing costing for sustainable design and construction standards. However, some consideration of the costs of *not meeting* sustainable construction standards should also be included in this work. The costs of not meeting sustainable design and construction standards may not be borne directly by the developers of a project, but will be borne by those living and working there, or by society in general. For example, the increasing costs of water and energy will impact far more on the occupants of buildings that are constructed to a lower standard of water or energy efficiency. In addition, the costs of poorly insulated homes can include health costs, which are borne by their inhabitants, and by society in general. Both the LDA and GLA should bear these issues in mind during any discussion about the costs of sustainable construction. Much work has already been done by BRE, WWF, BioRegional, Galleons Housing Association and others to show that the costs of sustainable design and construction need not be greater than for current standard practice and can have considerable lifetime cost benefits.
4. Below, we address the specific questions asked in the consultation letter.

**Question 1 - The range of assessment tools available currently does not address all of the standards in the SPG. How should a checklist be developed for the SPG?**

WWF are working with the Buildings Research Establishment (BRE) and Regional Development Agencies to formulate a sustainability checklist for developments. We suggest that the GLA works closely with this initiative to create the SPG checklist to ensure compatibility between checklists and avoid duplication of effort. This would also give the GLA a direct link to the development of the Government's Sustainable Building Code through the WWF/BRE project. A standard for construction that goes beyond the current BRE Eco-Homes standard is needed so that developers have to take into account and take action on all aspects of sustainable design and construction, not just a selection, as Eco-Homes allows.

**5. Question 2 - Views are sought on the most effective mechanism for monitoring developments in terms of how the SPGs standards are met once a building is built and operational (para 1.8).**

6. We agree that Borough resources are already stretched and that any monitoring arrangements for the SPG standards need to make best use of what is already available. Monitoring through building control officers at Borough level may offer the best option for monitoring as the SPG process could be combined with checks against the requirements of the Building Regulations. To help minimise duplication of work in future, the Government should

update the Building Regulations standards to match the SPG standards and the Mayor should lobby the Government to do this.

7. The GLA and Boroughs should also note that there is a pool of trained BRE assessors who could potentially be used to help with SPG monitoring, although outsourcing work to these assessors has resource implications in respect of training and funding.

**Question 3 - Do you find the Guide that summarizes the standards in a matrix form helpful; how could it be improved; do the identified generic types of development need modifying?**

8. The matrix appears to be useful and easy to use. However, the table of generic development types does not include major transport infrastructure projects (such as tramways, roads, railways, bridges, airports, etc.) and we assume that this is because major transport developments either fall outside an individual Borough's remit for planning regulation or because they are covered by regulations (such as those for SEA and EIA) which go beyond the sustainability checklist concept. The reason for this omission should be stated in the SPG so that the full range of developments is covered.

**Question 4 - Part 2 of the document is set out around the structure of the seven criteria of London Plan Policy 4B.6 and further guidance is offered on the principles that underlie these criteria. Is the level of detail provided under the principles and guidance helpful? Do some sections need more detail?**

**Question 5 - Are the signposts to further information helpful? Suggestions for further sources of information to signpost would be welcome.**

9. The level of detail contained in Part 2 of the SPG appears to be appropriate. Part 2 provides adequate information on all issues and signposts that allow further information to be accessed. Some further signposts would be useful.

**Question 6 - In Part 3 the SPG is seeking to ensure that issues of sustainable construction are considered at the early stages of design of the project. Is the relationship between Parts 2 and 3 clear in terms of the information given and the information being sought from applicants.**

10. The relationship between Parts 2 and 3 is clear. We welcome the fact that Part 3 is trying to cover some of the wider aspects of sustainable design and construction but it could go further in addressing those wider contextual issues highlighted in the SDC's foreword to the SPG, such as strategic land use decisions and availability of resources. Even if these issues cannot be covered in detail within the structure of the SPG checklist, some pointers as to the processes for considering these issues should be included within the SPG text. For example, reference when and how the Sustainable Development Framework should be used.

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