

The East Hampshire District Local Plan: Climate Change and Sustainable Construction Supplementary Planning Document (SPD)

Consultation Statement

Under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 it is a requirement to prepare and make available a Consultation Statement setting out:

- The persons the local planning authority consulted when preparing the supplementary planning document;
- A summary of the main issues raised by those persons; and
- How those issues have been addressed in the supplementary planning document;

Persons consulted when preparing the supplementary planning document

The Climate Change and Sustainable Construction SPD was subject to public consultation for a period of 6 weeks between 22 December 2021 and 2 February 2022. Copies of the draft document and supporting information – namely a Strategic Environmental Assessment and Habitats Regulations Assessment Screening and and the Statement of Matters and Availability (see Appendix 1) – were made available to view at the following locations during opening hours:

- East Hampshire District Council Offices
- Bramshott and Liphook Parish Office
- Horndean Parish Office
- Alton Library
- Bordon Library
- Liphook Library
- Petersfield Library

The SPD and supporting information was also made available to view online at:

<http://www.easthants.gov.uk/planning-policy/consultation>

(see Appendix 2).

Representations were invited via our online consultation portal, post or via email.

Documents available on the Council's Local Plan Consultation Portal

The Draft SPD was available to view online using our consultation portal. The portal enables users to submit comments on the document as they read it. The consultation portal can be accessed from the following link:

<https://easthants.oc2.uk/>

Consultation letters and emails

The Council notified those who had registered with the Council, an interest in being consulted on Supplementary Planning Documents. The Council consulted 264 contacts on the database, including statutory bodies, local government organisations, local interest groups and residents. The majority of members were contacted via email (see Appendix 3) and those without an email address were contacted via post.

Documents available on the Council's website

Copies of the Consultation Draft SPD, the Statement of SPD Matters and Availability, the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Assessment; were made available to view/download on the Council's website at:

<https://www.easthants.gov.uk/draft-climate-change-and-sustainable-construction-spd>

Summary of the main issues raised by those persons

A total of 35 individuals and organisations responded to the draft SPD. The comments made are summarised in the schedule attached as Appendix 4.

15 specific consultation bodies responded to the consultation and 4 of these organisation (listed below) did not request any changes to be made to the Draft SPD:

- National Highways
- Portsmouth Water
- The Coal Authority
- Four Marks Parish Council

The remaining specific consultation bodies, general consultation bodies and individuals submitted comments requesting changes to the documents. The key response themes can be summarised as:

The SPD should be updated to reflect the emerging change to building regulations requiring a 31% improvement of the Dwelling Emission Rate (DER) compared to the Target Emission Rate set out in building regulations as at 2013.
Concern was raised whether the SPD was introducing new policy requirements and potential financial burden relating to: <ul style="list-style-type: none"> • The requirement for tighter water consumption of 110 litres/person/day • Provision of electric vehicle charging points • Submission of sustainability checklist, sustainability statement, construction management statement and carbon reduction checklist • Requirement that all construction timber is 'grown in Britain'. • The removal of trees included in the carbon reduction calculations • Requirement for passive design
Concern regarding the mechanism for seeking allowable solutions, particularly now the Code for Sustainable Homes has been replaced.
Support was received regarding the principle of the multiple benefits of tree planting and the retention of existing trees and hedgerows for climate change mitigation.

It was noted that it should be clarified that inappropriate planting design may have impacts on biodiversity due to the habitat type of a proposed planting site. This could also have the potential for a loss in carbon sequestration and/or overall climate change mitigation – this risk should be acknowledged in the SPD

Useful guidance was suggested from NGOs such as the RSPB and Woodland Trust.

Document should specify what information is required for different types and size of development.

Elaborate on the potential to deliver Biodiversity Net Gain and how this can be achieved through the measures referred to in the document.

SPD would benefit from additional information about how developments can support rewilding and restoration of ecosystems using nature-based solutions.

A number of the proposed methods of insulation may not be suitable for traditionally constructed buildings, and poorly conceived interventions are likely to result in the deterioration of the fabric of the building, resulting in higher carbon emissions and poor energy performance in the long term, both through loss of building fabric and the resultant need to replace it.

How the comments and issues raised have been addressed in the SPD

The Officer comments relating to these concerns and how they have been addressed in the final version of the SPD can be found in Appendix 4.

Appendix 1: Statement of SPD Matters and Availability

The East Hampshire District Local Plan: Draft Climate Change and Sustainable Construction Supplementary Planning Document (SPD)

Statement of SPD Matters and Availability

Regulation 12 Town and Country Planning (Local Development) (England) Regulations 2012

Title: Consultation Draft Climate Change and Sustainable Construction Supplementary Planning Document

Area Covered: The parts of East Hampshire District that lie outside of the South Downs National Park Authority Area.

Subject Matter: The document aims to support development in the district (excluding the SDNP), to be accountable to the challenges of mitigating and adapting to climate change, and to address other sustainability issues as covered by the adopted local plan policies, of the East Hampshire District Council Joint Core Strategy (2014).

Representation Period: The draft document is available for public consultation for a period of six weeks between **9am on 22 December 2021** and **5pm on 2 February 2022**.

Copies of the draft documents and the supporting information are available to view at the following locations. Please note that opening times may vary due to government Covid19 guidelines. Some locations may therefore only be available through booking an appointment to view the documents. Please contact your venue of choice in advance.

Online at: http://www.easthants.gov.uk/planning-policy/consultation	At all times
East Hampshire District Council Penns Place, Petersfield GU31 4EX	Monday - Friday 09:00 – 17:00
Bramshott and Liphook Parish Office, The Haskell Centre, Midhurst Road GU30 7TN	Monday – Friday 10:00 – 13:00 (Please contact to book an appointment)
Horndean Parish Office, Tyfield House, Blendworth Lane PO8 0AA	Monday to Friday 09:00 – 16:00
Local Libraries at Alton, Bordon, Liphook and	During normal opening times

Hordean Parish Office, Tyfield House,
Blendworth Lane PO8 0AA

Monday to Friday
09:00 – 16:30

Local Libraries at Alton, Bordon, Hordean,
Liphook and Petersfield

During normal opening times

Representations to be sent to: Representations to the consultation draft
Supplementary Planning Document can be made in writing using one of the following
methods:

Through our online portal: <http://easthants.jdi-consult.net/localplan/>

By email: localplan@easthants.gov.uk

By writing in person to:

Planning Policy
East Hampshire District Council,
Penns Place,
Petersfield,
Hampshire, GU31 4EX

Adoption Notification: if you wish to be notified of the adoption of the Vehicle
Parking Standards SPD, please request this as part of your submissions.

Appendix 2: Planning Policy Consultation Webpage

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Draft Climate Change and Sustainable Construction SPD

The draft Climate Change and Sustainable Construction Supplementary Planning Document aims to support development in the district (excluding the SDNP), to be accountable to the challenges of mitigating and adapting to climate change, and to address other sustainability issues as covered by the adopted local plan policies, of the East Hampshire District Council Joint Core Strategy (2014) and Hampshire County Council Minerals and Waste Plan (2013).

Comments are now invited from all interested persons on the draft document and its suitability for informing future planning decisions in East Hampshire (outside of the South Downs National Park).

The consultation documents can be found below:

- [Draft Climate Change and Sustainable Construction SPD](#) (pdf 432 kb)
- [Statement of SPD Matters and Availability](#) (pdf 369 kb)
- [Draft Statement of consultation](#) (pdf 432 kb)
- [SEA/SA Screening and Environmental Impact Assessment](#) (pdf 810 kb)

It is important to note that only those representations that are made in writing and are received by the Council within the six week period **ending at 5pm on Wednesday 2 February 2022** will be considered.

Representations to the consultation draft Supplementary Planning Document can be made in writing using one of the following methods:

- **Online portal:** <https://easthants.oc2.uk/>
- **Email:** localplan@easthants.gov.uk
- **Writing to:** Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

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Appendix 3: Email to Consultees

From: EHDC - Local Plan
Sent: 22 December 2021 09:41
To: EHDC - Local Plan
Subject: Consultation Draft Climate change and Sustainable Construction Supplementary Planning Document and Revised Statement of Community Involvement (SCI)

Dear Consultee,

We are writing to inform you that East Hampshire District Council is currently consulting on a Supplementary Planning Document (SPD) and Revised Statement of Community Involvement (SCI) which are summarised below.

Consultation Draft Climate Change and Sustainable Construction SPD

The document aims to support development in the district (excluding the SDNP), to be accountable to the challenges of mitigating and adapting to climate change, and to address other sustainability issues as covered by the adopted local plan policies, of the East Hampshire District Council Joint Core Strategy (2014).

Revised Statement of Community Involvement (SCI)

A Statement of Community Involvement (SCI) describes how the public, businesses and interested groups within East Hampshire District (excluding the SDNP) can get involved in the creation of local planning policy, neighbourhood planning and the planning application decision making process. This revision has been produced in light of COVID19 and changes to working practices.

This is the fourth Statement of Community Involvement produced by the Council and upon adoption will supersede the current Statement of Community Involvement that was adopted in 2018.

We would therefore welcome your comments on the Consultation Draft Supplementary Planning Documents and Revised SCI. The six-week consultation period will commence on **Wednesday 22 December 2021** and close at **5pm Wednesday 2 February 2022**.

Full details of the consultations and all the supporting documents, can be found on our website: <http://www.easthants.gov.uk/planning-policy/consultation>

In addition, local libraries and information centres within East Hampshire District will be supplied with copies of the following consultation documents:

- Revised Statement of Community Involvement (SCI)
- Consultation Draft Climate Change and Sustainable Construction SPD
- Statement of SPD Matters and Availability for the SPD
- Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening for the SPD

Representations to the consultations can be made in writing using one of the following methods:

Through our online portal: <https://easthants.oc2.uk/>

By email: localplan@easthants.gov.uk

By writing in person to:

Planning Policy
East Hampshire District Council,
Penns Place,
Petersfield,
Hampshire, GU31 4EX

Please note that the comments received during this consultation cannot be treated as confidential. Responses will be published on the Council's website, together with the name and/or organisation name of the respondent.

Only those representations that are made in writing and are received by the Council within the six-week period ending at 5pm on Wednesday 2 February 2022 will be considered.

If you would like any more information on the Consultation draft Supplementary Planning Document or Revised SCI, please contact the Planning Policy team on 01730 234102 or visit the Council's website at <http://www.easthants.gov.uk/planning-policy/consultation>

Yours faithfully,

Appendix 4: Climate Change Supplementary Planning Document – Summary of Consultation Responses and EHDC Officer Comments

ID	Respondent	Response Summary	EHDC Officer Response
1	EHDC Regeneration & Place-Making Team	General Comment: please check document for typos – we noted a few.	Comment noted.
2		General Comment: I am unclear on the CRS, sustainability checklist, are there examples/templates of what these needs to include, how are these assessed do they cover similar things or could the sustainability checklist include the CRS.	<p>The Sustainability Checklist sets out the range of criteria and topics the Council either requires, through Local Plan policy, to include as part of development proposals, or encourages through the application of the guidance and best practice set out in the SPD. The Sustainability Checklist will be added to the list of planning application validation requirements.</p> <p>The Carbon Reduction Statement provides a template for submitting the SAP calculations. It has been revised to exclude duplication of topics included in the SC and provides additional guidance on the information to be submitted.</p>
3		General – it does not read relevant to East Hampshire – for example, are we expecting developers to install wind power generation?	The chapter regarding renewable energy sets out the range of technologies that potentially could be delivered in the district, either on-site or off-site technologies. Additional reference has been included to the Council's Renewable Energy study which sets out the potential for delivering the range of technologies in the district, including wind power – all be it with low potential and opportunity areas compared with the potential for other renewable technologies.

ID	Respondent	Response Summary	EHDC Officer Response
4		General – we have some examples in WHB of Carbon Offset (allowable solutions), POE and monitoring, reducing the performance gap and development of Statements for improving environmental performance. These could be referred to in the SPD to bring some reality or other examples of best practice across the country.	Following further discussions with the Regeneration & Place Making Team, case studies include the Quebec redevelopment site addressing the performance gap, and the Whitehill & Bordon 'green loop' as an example of green infrastructure and carbon sequestration have now been included in the respective sections of the SPD.
5		e) 4.14 - Allowable Solutions – I have concerns with this being used and needs to be set out clearly. These are as follows: a. A concern that this could be used as a cheaper way of achieving carbon reduction. Is there a way that can be worded to reduce this risk, i.e. not looking at viability but where further CO2 emission reductions are difficult to achieve through normal design and construction. b. Is there a mechanism for this to be paid? How is this managed? We have used a carbon offset pot within Quebec Park to offer energy improvements to homes in WHB but there is a cost to the council to manage this scheme. This just needs some thinking through. c. If allowable solutions is to be used then this needs to go in the glossary	The SPD has been revised to update the position regarding allowable solutions carbon offsetting scheme that has been withdrawn. Alternative carbon off-setting measures are only likely to be sought where proposals do not provide at least 10% of energy demand from decentralised and renewable energy sources (Policy CS24-b).
6		f) 5.58 – should we name considered species or provide guidance to liaise with tree officer or do we have a policy on what trees should be planted? Considering adapting to a changing climate some are tolerant, and some are not – depends on the location.	The SPD now refers to guidance published by the Woodland Trust regarding the planting of suitable trees for the environment, including adapting to climate change.
7		6.12 – do we need to consider the source of fuel for CHP – this is important.	Wording has been added stating the Council's preference for renewable CHP.
8		6.54 I assume this links to above. Same points as above. Could be reworded to include: 'locally-relevant low carbon energy infrastructure'. Think the terminology i.e. allowable solutions, carbon offset need to be consistent.	Refers to 6.53. As noted above, the SPD has been revised to clarify the role of allowable solutions and carbon offsetting.
9		6.57 – is the energy statement part of the sustainability statement?	Incorrect wording - now amended.

ID	Respondent	Response Summary	EHDC Officer Response
10		Great to see performance gap within the policy and also POE. Good to mention fabric first - this is where the most savings and long-term resilience will be.	Comment noted.
11	Woodland Trust	<p>Site layout, landscaping, urban form and building design</p> <p>We welcome the recognition of the positive role played by trees and green infrastructure in helping mitigate the impact of climate change and produce more resilient developments, in particular paras 5.14 and 5.15.</p> <p>We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019) and suggest that this could be included as an Annex to the SPD.</p>	Reference to guidance now included in the text and appendices.
12		<p>We welcome the recognition of the important role of trees and woodland in providing natural carbon capture and storage, as well as reducing the impact of air pollution. We welcome paragraphs 5.50-5.54.</p> <p>A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change (CCC), to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity.</p> <p>It is important to note that it is not only individual trees that capture and store CO2 but the complex of woodland soil and associated organisms. We would therefore recommend adding wording to the SPD to recognise this.</p>	Suggested wording now included.

ID	Respondent	Response Summary	EHDC Officer Response
13		<p>Cooling/shading - greenspace and tree canopy We welcome the recognition of the importance of trees for urban cooling and shading in sections 5.55 to 5.58.</p> <p>Trees and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems. They also make a valuable contribution to the quality of the public realm, helping reduce air, noise and light pollution and improve people’s mental health.</p> <p>As noted above, we recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019) and suggest that this could be included as an Annex to the SPD.</p> <p>The Woodland Trust supports the CCC’s recommended an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country’s biodiversity and climate crises.</p> <p>We recommend setting a target for tree canopy cover in local plans, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure. More information can be found in the Trust’s 2020 publication The Emergency Tree Plan.</p>	<p>Reference to guidance now included.</p> <p>The SPD cannot introduce targets for tree canopy cover where there is no respective Local Plan policy in place. The comment is however noted and will be considered during the preparation of the new Local Plan.</p>

ID	Respondent	Response Summary	EHDC Officer Response
14		<p>Green infrastructure and drainage/water storage</p> <p>We welcome the recognition of the positive role played by trees in natural drainage and flood management in section 5.64.</p> <p>Unlike engineered solutions, natural drainage systems provide additional biodiversity and landscape benefits.</p> <p>Woods and trees should form an integral part of all Sustainable Urban Drainage Systems (SUDS). Planting trees can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt. Trees intercept water as it falls, which is then directly evaporated back into the atmosphere. Roots help the infiltration of water into the soil, lowering the risk of surface water flooding. Tree roots can increase infiltration rates in compacted soils by 63%, and in severely compacted soils by 153%. Integrating SUDS and tree pit design can have a significant effect on 'slowing the flow'. Adequate soil volumes provided within hard surfaces can retain substantial volumes of water within the soil matrix, reducing inundation and providing slow release back into natural or engineered drainage systems.</p>	Comment noted.
15		<p>Adaptation to climate changes – habitats, planting, and landscapes</p> <p>We note the references in 5.68 to 5.76 on adaptive planting. The Trust continues to advocate for native broadleaf species as providing the best habitat for native wildlife species.</p>	Comment noted.

ID	Respondent	Response Summary	EHDC Officer Response
16		<p>Preserving local ecology/trees in the design of developments</p> <p>The Trust strongly welcomes the presumption that existing trees and woodland should be retained and protected (para 5.78). We encourage a presumption in favour of the retention and enhancement of existing trees, woodland, and hedgerow cover on development sites, and that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted.</p> <p>Where trees are unavoidably lost to development, we recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. We would further encourage the specification where possible of UK sourced and grown native tree stock for new planting, to support biodiversity and resilience.</p>	<p>The SPD cannot introduce a proposed ratio of tree replacement without the respective Local Plan policy.</p> <p>The SPD makes reference to the planting of species of native trees where suitable.</p>
17	RSPB	<p>2. Section 5: Sustainable design and construction guide</p> <p>The RSPB welcomes EHDC's position to take climate change seriously. Climate change is a top issue for the RSPB regarding its impact to biodiversity². The RSPB would encourage East Hampshire District Council to look at climate and ecological emergencies as one and the same, with opportunities to address both issues collectively; natural solutions to address climate change are welcomed and should be encouraged.</p> <p>Reference throughout the Draft 'Climate Change and Sustainable Construction SPD' document to the 'Climate Change Adaptation Manual' (2020)³ created by Natural England in collaboration with the RSPB throughout Green Infrastructure and ecology (p. 35-40) is therefore also welcomed by the RSPB.</p>	Comment noted.

ID	Respondent	Response Summary	EHDC Officer Response
18		<p>Para 5.75 identifies that ‘indigenous plant species – or those with local characteristics – should be considered for planting in landscaping schemes, where these are suitable for soil conditions and climate, and other benefits for wildlife’. The RSPB concurs that indigenous and local planting should be encouraged to increase the biodiversity value of a developed area and create better linkages across habitats for connectivity. However, it is important to acknowledge the potential for inappropriate planting design that may have impacts on biodiversity due to the habitat type of a proposed planting site, and also have the potential for a loss in carbon sequestration and/or overall climate change mitigation due to e.g. afforestation of habitat types with high carbon storage rates whereby trees can impact upon such habitats and their carbon storage effectiveness. The RSPB considers it critical to make planning decision-makers and developers aware of the risks and potentially damaging effects that tree-planting can have on the environment and climate change resilience in particular situations, and that sustainable design must consider the above risk along with the opportunities when implemented in the right place.</p>	<p>Similar wording added to highlight this risk.</p>
19		<p>The RSPB considers there to be a critical omission in the Draft ‘Climate Change and Sustainable Construction SPD’ document regarding the sustainable siting of development. For development proposals, consideration must be given to the habitat types on proposed sites. Although referenced within EHDC’s Draft Local Plan 2017-2036 (Regulation 18) under Policy S19 (Biodiversity, geodiversity and nature conservation), it is important to ensure this information is captured within the Draft ‘Climate Change and Sustainable Construction SPD’ as it is inherently relevant to the intended audience (para 2.9, p.6): ‘It is intended principally for applicants for planning permission and their agents, and for planning decision makers. It has been produced to ensure that applicants provide the right information so that planning decision makers can assess whether</p>	<p>Policy CP21 Biodiversity states that new development will be required to ‘...maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations’ and ‘...extend specific protection to, and encourage enhancement of, other sites and features which are of local value for wildlife, for example important trees, rivers, river corridors and hedgerows, but which are not included in designated sites’. The SPD is to be read in conjunction with the respective Local Plan policies.</p>

ID	Respondent	Response Summary	EHDC Officer Response
		development proposals comply with Local Plan policies.	
20		<p>Furthermore, one of two high level objectives set out by the Draft 'Climate Change and Sustainable Construction SPD' outlines the requirement 'to protect and enhance the local natural environment.' An integral opportunity for mitigating climate change is available in ensuring those spaces already providing climate change mitigation are safeguarded from development. Planning applications and planning decision makers should consider the suitability of a site based on its ecological and biodiversity qualities, and the potential climate change mitigation value that the site possesses. Areas with high ecological value in addition to providing natural capital gains through e.g. carbon sequestration should be discouraged from development by EHDC, retaining their environmental qualities to maintain climate change resilience and biodiversity across the District. The RSPB does not see any indication towards site preference within the 'Climate Change and Sustainable Construction SPD' document outside of the international, national or locally designated sites and irreplaceable habitats focused on in Policy S19 of the Draft Local Plan 2017-2036 (Regulation 18). Given the large amount of undesignated land that would be able to facilitate this function in providing natural capital and nature-based solutions to climate change, the RSPB considers this a critical omission in the Draft 'Climate Change and Sustainable Construction SPD'</p>	<p>It is not the role of the SPD but rather the role of the Local Plan to provide the policy framework against which proposals and the impacts on the proposed site are determined. Policy CP21 addresses matters regarding the protection of designated sites and features of ecological value and to '...prevent the fragmentation of existing habitats and allow species to respond to the impacts of climate change by making provision for habitat adaptation and species migration'.</p> <p>The SPD sets out how proposals could meet the requirements of Policy CP21.</p>

ID	Respondent	Response Summary	EHDC Officer Response
21	White Peak Planning (obo Bloor Homes)	<p>Policy CP24 Part (a) – Code for Sustainable Homes</p> <p>As the Code for Sustainable Homes has now been abolished, the requirement in Part (a) can no longer be applied and we welcome that fact that that the SPD does not seek to do this. However, para. 4.6 refers to the Planning Practice Guidance (PPG) and para. 4.8 states that the Council’s requirement is now for a 19% CO2 reduction in the Dwelling Emission Rate (DER) compared to the Target Emission Rate (TER) set out in the Building Regulations.</p> <p>The requirements of the outgoing Code for Sustainable Homes are set out in the 2014 Addendum to the Code for Sustainable Homes Technical Guide. For ‘Ene 1: Dwelling Emission Rate (England)’ the mandatory criteria for achieving Code Level 4 is a 19% improvement in the DER against the Building Regulations Approved Document L1A 2013 TER. The Council can therefore only require a 19% reduction in CO2 emissions against the 2013 version of Approved Document Part L1A 2013 and not against subsequent versions. This distinction is made in Appendix 5 (Carbon Reduction Statement Template), but not in the main text of the SPD and therefore this should be added to avoid confusion. Furthermore, this 19% reduction should be across the development as a whole and not be dwelling specific.</p> <p>It should be noted that since the draft SPD was written, Approved Document Part L1A has been revised and the 2021 version now includes a 31% reduction in CO2 emissions compared to the 2013 version.</p> <p>The requirement in the SPD for a 19% reduction in CO2 emissions against Part L 2013 will be superseded by the new Building Regulations once they take effect on 15th June 2022 and would therefore no longer be necessary. This should be acknowledged in the final version of the SPD.</p>	<p>The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations.</p>

ID	Respondent	Response Summary	EHDC Officer Response
22		<p>In addition to the above, Para. 5.7 states: ‘proposals for zero emissions development are required under JCS Policy CP24’; however, this is not consistent with the Council’s position in the rest of the SPD and should be removed.</p>	<p>The reference to zero emissions developments has now been removed due to the withdrawal of the CfSH.</p>
23		<p>Policy CP24 Part (b) – Energy Demand Part (b) of the policy requires applicants to demonstrate that at least 10% of the site-wide energy demand is met through the use of decentralised and renewable or low carbon energy sources. Para. 4.17 of the SPD states that applications for major residential development must provide:</p> <ul style="list-style-type: none"> • a sustainability checklist. • a Carbon Reduction Statement including design-stage SAP/SBEM data (Appendix 5 – Carbon reduction template). • a Construction Management Statement. <p>Sustainability Checklist A Sustainability Checklist Template is included in Appendix 4 of the SPD. It would be helpful if each row in the checklist had a number for ease of reference. The top row of the Sustainability Checklist on page 76 of the SPD asks the following:</p> <ul style="list-style-type: none"> • Does the scheme achieve a minimum of 19% carbon reduction Dwelling Emission Rate above the Target Emission Rate? <p>As discussed above, the first row should specifically refer to Approved Document Part L1A 2013. After the 2021 update to Building Regulations Part L takes effect, this will no longer be necessary and this should be noted in the SPD.</p>	<p>See comment above. The Sustainability Checklist has been revised accordingly.</p>

ID	Respondent	Response Summary	EHDC Officer Response
24		<p>Carbon Reduction Statement</p> <p>A Carbon Reduction Statement Template is included in Appendix 5 of the SPD. Due to the detailed nature of this, it should only be required to be submitted for full planning applications, or for relevant applications for the approval of reserved matters. It should not be required for outline planning applications as the necessary detail is not yet known and should instead be secured by planning condition.</p> <p>Section 1 'Carbon Reduction Statement' includes a table where the applicant would demonstrate the percentage improvement in CO2 emissions against Part L 2013 for each unit. As discussed above, the requirement for a 19% improvement should apply to the residential development as a whole rather than individual units, but the table could be used to demonstrate how this will be achieved.</p> <p>It should be noted in the SPD that once a development is being constructed to Part L 2021, there will be no requirement to complete Section 1 as it specifically refers to Part L 2013.</p> <p>Section 2 requires details of the measures that will be implemented to reduce carbon dioxide emissions and energy consumption, as well as the incorporation of renewable energy technologies. There is some duplication with the Sustainability Checklist in Appendix 4 and it is not clear why both of these need to be completed as they could be combined into a single document. As para. 4.17 requires both of these documents to be completed for applications for major residential development, the Council should ensure that specific information only needs to be supplied once, rather than being included in both documents.</p> <p>Section 2 includes details of carbon dioxide reduction, but this should ideally be included in Section 1. It states that the carbon reduction requirement (assumed to be the 19% reduction) applies to each unit,</p>	<p>The Carbon Reduction Statement has been revised to remove duplication and clarification on when the statement should be submitted.</p>

ID	Respondent	Response Summary	EHDC Officer Response
		<p>but as previously discussed, this should apply to the residential development as a whole.</p> <p>For clarity, Section 1 of the Carbon Reduction Statement should relate to the 19% reduction against Part L 2013 only and Section 2 should require details of how Part (b) of Policy CP24 is addressed, i.e. 10% of the site-wide energy demand to be met through the use of decentralised and renewable or low carbon energy sources.</p>	

ID	Respondent	Response Summary	EHDC Officer Response
25		<p>2. Site layout, landscaping, urban form and building design Guidance is provided in paras. 4.18 to 4.21 of the SPD and the relevant JCS policies are 'Policy CP27 Pollution' and 'Policy CP29 Design'. Para. 4.20 requires the submission of supporting information in the Carbon Reduction Statement on how passive design has been incorporated within the proposed scheme's layout and design. Following a review of Policies CP27 and CP29, there is no policy basis for the Council to require the submission of this information and the SPD should not attempt to introduce new policy requirements. This requirement should therefore be deleted from the SPD and the Carbon Reduction Statement Template.</p>	<p>The SPD has been amended to recognise that whilst there is no Local Plan requirement to consider passive design and submit the respective information, passive design principles are encouraged due to the range of benefits set out in the document as good practice.</p>

ID	Respondent	Response Summary	EHDC Officer Response
26		<p>4. Green Infrastructure and ecology Guidance is provided in paras. 4.31 to 4.33 of the SPD and the relevant JCS policy is 'Policy CP28 Green Infrastructure'.</p> <p>Para. 4.32 states: 'All development applications need to show that green infrastructure provision has been considered in response to policy requirements– and also in regard to climate change mitigation and adaptation. Green infrastructure must be designed with adaptation to climate change, and contribution to passive design5 (see section 5 below), in mind, and any potential contribution to sustainable drainage requirements where appropriate.'</p> <p>Para. 4.33 then states under 'submission requirements': 'Carbon Reduction Statement - Removal of mature trees will need to be factored into the Carbon Reduction calculations'</p> <p>There is no policy basis for the Council to require the submission of this information in relation to climate change and carbon reduction and the SPD should not attempt to introduce new policy requirements.</p> <p>No methodology has been specified in either para. 4.33 or para. 5.52 as to how the removal of trees would be factored in to the carbon reduction calculations, or what constitutes a 'mature tree'. These requirements should be deleted from the SPD and the Sustainability Checklist also updated to reflect this.</p>	<p>Chapter 4 has been revised and merged with (new) chapter 6. It should be noted that policy CP21 Biodiversity sates 'New development will be required to...contribute towards maintaining a district-wide network of local wildlife sites, wildlife corridors and stepping stones between designated sites and other areas of biodiversity value or natural green space. This will help to prevent the fragmentation of existing habitats and allow species to respond to the impacts of climate change by making provision for habitat adaptation and species migration. This is supported by Policy CP28 (Green Infrastructure) and the District's Green Infrastructure work.' The Council considers the wording regarding green infrastructure and the information to be submitted is appropriate and reflects Local Plan policy, however the reference to passive design has been amended to encourage proposals to consider passive design principles.</p> <p>Reference to the removal of trees being factored in to the carbon reduction calculations has been deleted.</p>
27		<p>5. Resources, materials and waste Guidance is provided in paras. 4.34 to 4.45 of the SPD and the relevant JCS policy is 'Policy CP24 Sustainable Construction. Para. 4.40 states: 'For residential developments the requirement is that applicants should set out what measures they are taking to maximise the use of green materials and that all construction timber is 'Grown in Britain' certified, or where this is not feasible, FSC certified.' There is no requirement in Policy CP24 for the submission of the above information and the SPD should not attempt to introduce new policy requirements.</p>	<p>Wording has been amended to encourage applicants to consider and set out what measures they are taking to maximise the use of green building materials.</p>

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28		<p>6. Development location and measures that enable sustainable lifestyles for building occupants Guidance is provided in paras. 4.46 to 4.48 of the SPD and the relevant JCS policy is 'Policy CP31 Transport'. Para. 4.48 states: 'If sustainable transport enhancements, such as travel plans, smart travel, or design implementations can be calculated to reduce carbon reductions from transport, this must be set out in the carbon reduction statement.'</p> <p>There is no policy basis for the Council to require the submission of this information in relation to carbon reductions and the SPD should not attempt to introduce new policy requirements.</p>	<p>Wording provides reasonable guidance as to what should be submitted to demonstrate proposals are in accordance with Policy CP31.</p>
29	LRM Planning (obo Hallam Land Management Limited)	<p>Energy and Carbon Reduction</p> <p>Policy CP24 of the Joint Core Strategy already establishes a requirement for certain development proposals (including new housing) to achieve a 19% CO2 in carbon emissions (equivalent to what was Code for Sustainable Homes Level 4. The Written Ministerial Statement on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments. The statement sets out the government's expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix) (NPPG paragraph ID: 6-012-20190315 refers). This approach is consistent with paragraph 154(b) of the NPPF.</p> <p>As the SPD refers to, the Government are in the process of introducing amendments to the Building Regulations which will achieve greater levels of energy efficiency and reductions in CO2 emissions.</p> <p>These are the technical standards that are intended to relate to new housing development. The Local Plan's policy position will therefore be superseded in due course.</p> <p>Policy CP24 also includes a % requirement of energy to be provided by</p>	<p>The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations.</p>

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		on-site renewables or low carbon energy. The minimum 10% is now often sought.	
30		The SPD helpfully sets out the information required to be provided alongside a planning application, comprising a sustainability checklist; a Carbon Reduction Statement including design-stage SAP/SBEM data; and a Construction Management Statement for certain types of development.	Comment noted.
31		<p>Site Layout, landscaping, urban form and building design Paragraph 4.18 of the SPD refers to “All residential and minor non-residential developments will be expected to follow passive design principles”; although it is important to note that this is not a policy requirement of CP27, CP29 or CSWB5.</p> <p>Paragraph 4.20 of the SPD requires the Carbon Reduction Statement to show how passive design has been incorporated into a scheme’s layout. Whilst this is unobjectionable as principle, it cannot follow that an application should be refused where passive design has not been possible because of other legitimate planning considerations as there is no policy basis for this.</p>	The SPD has been amended to recognise that whilst there is no Local Plan requirement to consider passive design and submit the respective information, passive design principles are encouraged due to the range of benefits set out in the document as good practice.
32		We also note and agree that consideration should be given to the risk of “overheating”; whilst para 4.21 of the SPD refers to various ways this can achieved, it omits reference to landscape planting as a means to provide shading both of houses, their amenity spaces and areas of open space.	Revised wording has been included in (new) chapter 4.

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33		<p>Water Resources</p> <p>Policies CP24 and CP26 encourage water efficiency with new developments and by reference to the Code for Sustainable Homes. Paragraph 4.22 of the SPD appears to be requiring new development to achieve the optional higher water efficiency requirement in Part G of the Building Regulations e.g., water consumption of not greater than 110 litres/person/day, rather than 125 litres/person/day.</p> <p>This overlooks that fact that the introduction of the optional requirement must be undertaken in the Local Plan as set out in Paragraph ID 56-014-20150327 refers. Similarly, the suggestion later in the consultation document that a different minimum standard will automatically be required must be considered through the Local Plan process.</p> <p>Other measures to improvement water efficiency are also encouraged but cannot be required. Paragraph 4.26 of the SPD informs the reader that “water intensive development” will only be granted planning permission where a separate supply of water can be demonstrated. However, no definition of what comprises a water intensive development is given in the SPD.</p>	<p>The supporting text to policy CP26 Water Resources / Water Quality of the JCS states, 'In light of further supporting the twin-track approach, the Environment Agency has demonstrated that it is possible to achieve Level 3 of the Code for Sustainable Homes (105 litres per head/day) in a new building at low cost.' Therefore the 110 litres/per head/day is marginally less than the minimum requirement set out Policy CP24 under the now withdrawn CfSH Level 3 which has been superseded, in part, by the National Housing Technical Standards. Wording has been included in the SPD to clarify this position.</p> <p>The SPD refers to an example of a golf course as water intensive development and each proposal for other non-residential uses, i.e. other leisure / tourism development will be considered on its merits.</p>
34		<p>Materials</p> <p>Development proposals can be brought through the planning system in a number of ways (e.g., outline and full applications, permission in principle, local development order). Major development is often secured in two parts – an outline permission which establishes the principle and then reserved matters pursuant to the principal decision. In those instances, details about the materials to be used in the construction of the project will not be known and it can be several years until those details are required as part of the reserved matters approval process, particularly on multi-phase developments. In those instances, a planning condition is the appropriate means of securing materials information, and this information should not be required as part of the sustainability checklist for an outline</p>	<p>The guidance in (new) chapter 10 has clarified that in some instances information may need to be submitted later in the application process and be required by planning condition.</p>

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		application. The SPD should be clear that certain aspects of the sustainability checklist are relevant to that later stage of the planning process.	
35		<p>Development location and measures to ensure sustainable lifestyles for building occupants.</p> <p>In the first instance it is the role of the Local Plan to identify where new development should be located, noting that paragraph 105 of the NPPF required the planning system to actively manage patterns of growth to achieve transport related objectives. Development close to the main towns within the District clearly afford a greater potential to achieve active travel and reduce the dependence of the private car.</p>	Comment noted - (new) chapter 8 encourages layout and design to have regard to proximity, accessibility and connectivity to local facilities and services including active travel.
36		<p>Climate change adaptation</p> <p>This is a feature of careful and considered design, which can occur at different stages in the planning process. An outline application would concern the broad arrangement and principles of development, whereas reserved matters would consider in detail issues of layout and the design and appearance of individual buildings. The SPD's checklist must be sufficiently flexible to allow for different levels of information to be provided at different times.</p>	The guidance in (new) chapter 10 has clarified that in some instances information may need to be submitted later in the application process and be required by planning condition. The Sustainability Checklist is sufficiently flexible to accommodate information at reserved matters stage.
37		<p>Sustainability Checklist</p> <p>The Sustainability Checklist set out at Appendix 4 has much to commend; is exceptionally detailed and covers a great many areas. However, not all planning applications will be able to provide the information that the checklist is seeking; an outline planning application would only provide a discussion of certain matters (for example tree planting) with the detailed information following at the reserved matters stage. It will be important that the Sustainability Checklist is used in a proportionate manner relative to the stage of the planning process and the type of planning application.</p>	The guidance in (new) chapter 10 has clarified that in some instances information may need to be submitted later in the application process and be required by planning condition.

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38	South Downs National Park Authority	<p>We have the following overarching observations of the draft SPD:</p> <ul style="list-style-type: none"> • Although there is plenty of useful information in this draft, it suffers from being very long, not very accessible (mostly text) and not very navigable in its present form. • It is not very clear from the document what EHDC’s current expectations for sustainable construction are for new development as chapters 4 and 5 seem to contradict each other • A summary table of minimum requirements or expectations would be very helpful 	<p>Comment noted - the structure of the document has been revised, including merging chapters 4 and 5 and individual chapters addressing each topic previously in chapter 5.</p>
39		<p>Beyond minimum CO2 reductions/BREEAM excellent</p> <p>Para. 4.12 states: All the above are minimum requirements and applicants are encouraged to go higher where possible. In the instances that the requirements are financially unviable or technically unfeasible, then the applicant will need to demonstrate this with appropriate evidence in support of a planning application. Moreover, the applicant will be expected to meet the highest percentage CO2 reduction / BREEAM score that is viable. The above requires new development to follow the hierarchical approach to reducing energy demand and associated carbon emissions. Further guidance is provided throughout Section 5.</p> <p>Does the highlighted sentence mean that EHDC will require applicants to show that the maximum CO2 reduction/BREEAM score (potentially 100% or BREEAM ‘Outstanding’) has been targeted within the limits of financial viability and technical feasibility?</p>	<p>Reference deleted as it is not considered to be consistent with Policy CP24.</p>
40		<p>On-site low or zero carbon energy</p> <p>For residential development, the 10% minimum figure in CP24b will in most cases merely contribute to the larger 19% figure (interpretation of CP24 following abolition of Code for Sustainable Homes) as that has not been restricted to the energy efficiency of the dwelling. Policy SD 48 in the SDNPA local plan makes that distinction which is reflected in the</p>	<p>The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations</p>

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		SDNPA SPD. The same distinction could be made here in the SPD as otherwise the default CO2 reduction is likely to be only 19% in most cases.	
41		<p>Passive house</p> <p>Although references to 'passive house principles' are welcome, in practice, designers use this phrase for a whole range of outcomes, such that it does not prove useful and is likely to lead to significant resource to allow officer interrogation and negotiation/argument in every case. Requiring applicants to assess the proposal using the passive house modelling software package, PHPP which has minimum metrics would be an easier option as this is a set of internationally recognised criteria for passive house standards.</p> <p>A PHPP verification report requires metrics for things like space heating, overheating, airtightness and energy demand. It would be relatively simple to assess an application against these measures and compare them with what would be required for passive house certification, even if full compliance was not expected.</p>	The SPD has been revised to encourage the consideration and implementation of passive design principles rather than a requirement.
42		<p>Water</p> <p>Measures beyond the minimum 110litres/person and BREEAM excellent mandatory standard, such as through rainwater harvesting, grey water recycling are unlikely to be targeted by applicants if they are only 'encouraged'.</p> <p>Where, for whatever reason, BREEAM excellent is not achieved, will EHDC still expect the mandatory Wat 01 credits?</p>	Yes - wording has been revised to clarify the requirement for meeting the 110 litres/per person/per day.
43		<p>SuDS</p> <p>Reference to SuDS guidance in the CIRIA SuDS Manual recommended, not just Susdrain guidance.</p> <p>At the end of 4.27 it is stated that SuDS may not be appropriate in areas susceptible to flooding. This should not be the case as SuDS probably very relevant as reducing speed of runoff (and avoiding underground engineered drainage approaches) is part of the wider solution to flooding.</p>	Guidance added and wording revised.

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44		<p>BNG</p> <p>Is a minimum % being considered? The Environment Act and subsequent regulations will require min. 10%.</p>	<p>Yes - wording has been added to clarify the expectations regarding BNG.</p>
45		<p>Waste</p> <p>Compost bins are low cost but when used can significantly reduce household organic waste going to landfill.</p> <p>'Encouraged to minimise' does not sound very likely to change outcomes. Perhaps maximum waste % targets as demonstrated in Waste Construction Plans would be more robust?</p>	<p>The Council does not have a policy basis or evidence for introducing a target.</p>
46		<p>Materials</p> <p>Welcome reference to 'Grown in Britain' timber.</p> <p>The embodied energy/green house gas emissions of construction is a very difficult area to measure unless LPAs start requiring whole life carbon assessments, which are likely to be necessary as part of the move to zero carbon buildings. [later referenced in 5.88 but only as something 'supported' and not required.]</p>	<p>Comment noted.</p>
47		<p>Zero carbon guidance</p> <p>Although not arguing with the points of guidance (orientation, natural light, insulation etc.), achieving operational zero carbon in buildings is still beyond the normal practice of most developers, such that specific specialist professional help will be needed (sustainable architects working with other professions) and this level of expertise is beyond what a local authority should be expected to usefully advise on in detail. It might be better to provide useful links to e.g. AECB guidance and advice, and to case studies where zero carbon has already been achieved in practice.</p>	<p>Reference to 'On-site low or zero carbon energy' has been deleted due to the withdrawal of CfSH in respect of Policy CP24.</p>
48		<p>Water efficiency guidance</p> <p>Detail on water saving measures in chapter 5 probably superfluous as long as the requirement remains 110 litres as this is very easy for house builders to achieve with best practice fittings and appliances. Grey water and rain water not necessary to achieve 110 litres. Code 6 scheme in Southampton achieved below 80 litres without grey or</p>	<p>The chapter on water efficiency includes guidance for proposals seeking to exceed the minimum requirements and introduce other water saving measures.</p> <p>Reference to water butts now included.</p>

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		rainwater. Water butts not mentioned/required. These are low cost and enable some rainwater to be used in gardens.	
49		Checking compliance There are requirements for applicants, such as: 5.92 Scheme proposals will need to show that the selection of building materials for construction will be long-lasting and durable which raises the question, who will be checking the list of building materials and assessing their robustness?	Reference to this section has been deleted and guidance has been referenced regarding the selection of building materials.
50		Green roofs Should a minimum requirement be considered? From our experience where green roofs are required in a proportionate manner (10 homes and above min 10% of roof area) and not at all, where deemed inappropriate for other design reasons, applicants have found this relatively easy to achieve via garages, car barns and storage sheds.	There is no policy basis to set a minimum requirement, however it is a matter that will be considered in preparing the new Local Plan.
51		Sustainable Travel Should electric bikes, scooters and mobility scooters also be covered here? Are minimum requirements for storage included or referenced?	Wording has been added to encourage provision of parking and charging facilities for e-bikes on larger schemes, however the Council does not have locally set standards for this. Reference is made to all (active travel) routes being provided for all abilities.
52		Renewable Energy We welcome reference to the setting of the South Downs National Park in reference to wind turbines, this is also important for ground mounted solar arrays / solar farms. The NPPF states development within the setting should be sensitively located and designed to avoid or minimise adverse impacts on the National Park.	Comment noted.

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53		<p>EV Charge Points</p> <p>5.123 says It is recommended that all new development provides EV charging points or where this is not possible, provides the relevant infrastructure feed into the buildings in preparation for the transition to EV.</p> <p>So this is completely optional and the recommendation can be ignored. As building regulations are moving to make this a requirement anyway, surely EV charge points should be a default requirement?</p>	<p>SPD has been updated to reflect the emerging changes to the Building Regulations.</p>
54		<p>ASHPs</p> <p>An important point to note is that ASHPs should not be physically connected to the wall of the property as vibrations will travel through the building. Instead they should be fixed to the ground just outside an exterior wall.</p>	<p>Wording amended.</p>
55	<p>Portsmouth Water</p>	<p>We are impressed with your SPD and consider it a very comprehensive document that clearly shows that you have extensively considered the current and future impacts of climate change. We welcome the widespread consideration of water efficiency within the document, and are pleased to see you are encouraging responsible water use across both household and non-household, and also within construction.</p>	<p>Comment noted.</p>

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56	Black Box Planning (obo Bewley Homes)	<p>However, although supportive of the objectives of the SPD, the provisions within the SPD with regards to Allowable Solutions and Offsetting (and the associated implementation of policy CP24 of the JCS) are not provided to a sufficient level of detail to support the operation of these policies as a material consideration in planning decisions.</p> <p>At Paragraph 4.14, the SPD identifies that proposals for major development should ensure that their on-site renewable or low carbon energy production and resource efficiency is maximised. Where on-site proposals to achieve higher levels of carbon reduction are not feasible or viable then ‘allowable solutions’ must be used.</p> <p>‘Allowable solutions’ are defined as operated in accordance with the Zero Carbon Hub report recommendations, as developed by Government policy, to permit residual emissions to be mitigated between the minimum carbon compliance standards and zero carbon homes (equivalent of Code Level 5) by off-site means in agreement with the Local Authority. The wording within the SPD reflects that included within the JCS on its adoption in 2014. However, it is noted that subsequent to the adoption of the JCS the concept of ‘allowable solutions’ (as part of the government’s wider ‘Zero Carbon’ policy) was withdrawn in 2015/16.</p> <p>The Zero Carbon Hub consultations on the implementation of allowable solutions were not completed and the four Zero Carbon Hub reports on allowable solutions contain a series of contrasting options that were not taken forward. The SPD does not provide clarity as to which Zero Carbon Hub Report recommendations should be taken into consideration for the delivery of allowable solutions nor suggest an alternative, given that these recommendations were not finalised or implemented.</p>	<p>The SPD has been revised to update the position regarding allowable solutions carbon offsetting scheme that has been withdrawn and alternative carbon off-setting measures are only likely to be sought where proposals do not provide at least 10% of energy demand from decentralised and renewable energy sources (Policy CS24-b).</p>

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57		<p>Whilst the SPD does state (at Paragraph 6.53) that any short fall provision on site must be provided off-site, through a cash-in-lieu contribution, or through a green tariff, the SPD does not provide clarification as to how the mitigation – identified as the difference between minimum carbon compliance standards and zero carbon homes (equivalent of Code Level 5) – will be calculated. Given the withdrawal of the Code for Sustainable Homes, it is noted that where referenced elsewhere within the SPD equivalents to the Code for Sustainable Homes have been provided. In this case such an equivalent has not been provided.</p> <p>The SPD therefore requires modification to clarify the operation of allowable solutions and offsetting, with reference to the above identified issues with regards the Zero Carbon Hub Report recommendations and how off-site mitigations will be calculated with reference to Sustainable Homes Level 5.</p>	<p>The SPD has been revised to update the position regarding allowable solutions carbon offsetting scheme that has been withdrawn and alternative carbon off-setting measures are only likely to be sought where proposals do not provide at least 10% of energy demand from decentralised and renewable energy sources (Policy CS24-b).</p>
58	Petersfield Climate Action Network	<p>Key points:</p> <p>A. Incentives and viability: The contents of the SPD are welcome but will not be enforceable in the short term. We therefore suggest introducing more incentives for sustainable development and toughening the requirements on viability and feasibility.</p> <p>B. Education: The education benefits of the SPD for applicants could be maximised by improving the presentation.</p> <p>C. The emerging Local Plan: The council should set out details of a public process by which it will convert the ideas in the SPD into policies in the emerging Local Plan.</p>	<p>The wording in the SPD is considered proportionate to the respective Local Plan policies and where the Local Plan is not explicit on the matters considered in the SPD.</p> <p>The document has been restructured with some consolidation of sections, notably section 4 and 5.</p> <p>The SPD provides guidance on the adopted Local Plan policies, not the emerging Local Plan. The new Local Plan will however consider the range of topics set out in the SPD, provide new policies relating to climate change and sustainable construction and potentially publish new guidance to support their implementation.</p>

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		<p>D. Other comments on the text, including on embodied carbon and sustainable building materials, protecting mature trees, giving more priority to electrifying heat and discouraging gas-powered CHP, introducing nature-based solutions, and other things.</p>	

ID	Respondent	Response Summary	EHDC Officer Response
59		<p>A. Incentives and viability Section reference: Para 4.12 – CP24</p> <p>The consultation document explains at para 2.4 that the SPD will not be enforceable under the current Local Plan. It only offers guidance on how policies in the current Local Plan will be implemented and cannot add new policies or add unnecessarily to the financial burden of developers.</p> <p>To maximise its impact now, the SPD should therefore focus on creating incentives for sustainable development and disincentives for less sustainable development. Possible incentives could include:</p> <ul style="list-style-type: none"> • Emphasize that going beyond current requirements would be a positive material consideration in planning decisions • Consider ways to fast-track high-climate ambition applications <p>Ease the submission requirements for developments with high climate ambition. For example, developments pursuing certified Passivhaus design status might not need to supply so much detailed information to support applications, such as exempting parts of the Carbon Reduction Statement, the energy elements of the Sustainability Checklist or other document requirements, especially where these duplicate parts of the Passivhaus process.</p> <ul style="list-style-type: none"> • Add advice to help applicants access grant funding for retrofit measures, energy efficiency measures, district and community heating, etc. with clear links to the available schemes and help to apply. This could be done online to ease updating, for example every six months. • To incentivise developers to fit low carbon heating, the SPD could maybe look at waiving or simplifying other requirements (e.g. BREEAM) or maybe a reduction in CIL on homes that use heat pumps. 	<p>The SPD and the Council as the planning authority cannot apply the incentives referred to. The scope of the SPD is limited to providing additional guidance on the adopted Local Plan policies and further best proactive on the range of topics considered.</p> <p>National policy sets out the presumption in favour of sustainable development, but it is for the applicant to demonstrate how the proposal is considered to be sustainable in accordance with local and national policy.</p> <p>Information regarding energy efficiency funding schemes is available on the Council's website.</p>

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60		<p>For the disincentives, the SPD could raise the burden on applications that seek exemption from normal sustainability policy standards. Para 4.12 says that applicants who claim the requirements of CP24 are financially unviable or technically unfeasible “will need to demonstrate this with appropriate evidence in support of a planning application”. This requirement could be fleshed out to ask for evidence of financial unviability to include a breakdown of the incremental costs of meeting the policy and the expected profit of the development as a whole, supported by quotations and valuations. If the cost uplift is higher than 4-8% (see below on para 4.4), it could ask for an explanation. It could ask for evidence of technical non-feasibility to be supported with an engineer’s or surveyor’s report. It could require submissions to use only up-to-date prices and technologies.</p>	<p>All viability assessments should be completed in accordance with national guidance.</p>
61		<p>Section reference: Para 4.4 - Viability The statement that ‘all policies were found to be viable’ is very weak and would benefit from evidence of impact assessment. For exemplar standards of development, it may be helpful to reference that even building to the Passivhaus standard would not increase build costs beyond around 4-8%</p>	<p>Please see previous comment.</p>

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62		<p>Education Section reference: Para 2.8 – 2.9</p> <p>The SPD is a good opportunity to educate a captive audience about sustainable development practices they may not have been aware of, at the time when they are making decisions about the materials and design of their project.</p> <p>The current presentation of the draft SPD is rather dull and will not be an easy read for many. This does not matter much for the larger projects where developers typically engage a wide range of expert consultants. The problem arises with smaller projects, single dwellings and retrofit projects where those involved try hard to avoid spending money on what in their view is unnecessary and costly advice.</p> <p>The proposed EHDC SPD draft does make extensive use of words such as ‘can’ and ‘may’ that do tend to weaken the impact of the document considerably. It would help if the SPD and the subsequent, much more important, follow up version relating to the new Local Plan, were written with a more positive tone of language.</p> <p>The SDNPA have in that respect acknowledged this situation and published a much more helpful SPD, which uses positive language and a multitude of visual aids, striking a good balance between helping people with their planning application and educating them about sustainable building development.</p>	<p>It should be noted that applicants will be steered to the guidance in the document through the requirement to submit the Sustainability Checklist. The document has been restructured to include individual chapters regarding each of the climate change and sustainable construction matters.</p> <p>The guidance in the SPD reflects whether the information and standard are required by policy or optional best practice which achieve the principles of local and national policy. The new Local Plan will provide the opportunity to review climate change and sustainable construction matters, Local Plan policies and potentially publish new guidance.</p>

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63		<p>Section reference: para 4.3, 4.10</p> <p>It is likely that the updated Part L of the building regulations coming into force in June 2022 will have significant impact on building standards. The SPD should clarify that the new building standards will be applied at the earliest possible date.</p> <p>A process is needed for making other updates to the SPD relatively quickly, subject to appropriate public consultation. EHDC should anticipate the mechanics of keeping this a moving document – easy in electronic form but some thought is needed for the hard copy - maybe loose leaf?</p>	<p>The SPD has been update to reflect the emerging changes in Building Regulations relating to energy efficiency standards.</p> <p>The SPD can only be prepared, reviewed and adopted in accordance with the Town and Country Planning Regulations 2012. Further guidance regarding climate change and sustainable construction will be considered following the adoption of the new Local Plan.</p>
64		<p>General</p> <p>The SPD is not specific to East Hants and would be stronger if it referred to the distinctiveness of the area and local circumstances. The rural nature of district, its large number of off-gas properties that have high carbon emissions from oil and LPG, potential for alternative energy sources such as ground source or water source heat pumps, availability of land and roof spaces for solar PV etc. are all factors that could be harnessed in the planning guidance as well as in the technical advice chapters 5 and 6.</p> <p>Another local aspect to mention is the special context of the South Downs National Park, which covers much of the EHDC area and forces developments to be concentrated in the remaining 43% of the district. This concentrates the environmental impacts outside the park, increases the risk of spill over effects inside the park and its sensitive habitats, and increases the need for measures to mitigate the climate and biodiversity impacts.</p>	<p>The SPD provides guidance on a range of matters to be considered on a case-by-case basis. Reference has now been added to the Council's renewable energy study which sets out the potential for renewable energy technologies across the district.</p> <p>The SPD also includes case studies of the Quebec redevelopment site addressing the performance gap and the Whitehill & Bordon 'green loop' as an example of green infrastructure and carbon sequestration, have now been included in the respective sections of the SPD.</p> <p>Matters regarding development which could impact on the SDNP are considered against the policies in the Local Plan including CP19 Development in the Countryside and CP20 Landscape.</p>

ID	Respondent	Response Summary	EHDC Officer Response
65		<p>Section reference: Paras 4.13-4.16 and 6.22-6.31 – Electricity storage and Microgrids</p> <p>Section 4 should encourage electricity storage and, for larger developments, the consideration of microgrids. The corresponding guidance in section 6 could be amplified to explain the benefits of these technologies.</p>	<p>It is considered there is sufficient wording in the SPD regarding electricity storage. The Council does not anticipate micro grids coming forward on proposals in the adopted Local Plan, but could be explored in preparing the new Local Plan.</p>
66		<p>Section reference: Paras 4.13-4.16 – Allowable solutions loophole</p> <p>The existing policy CP24 says “Where onsite proposals to achieve higher levels of carbon reduction are not feasible or viable ‘allowable solutions’ should be used” and then refers to Zero Carbon Hub report recommendations, as developed by Government policy in a footnote (without giving a further reference, which should be provided).</p> <p>This could be a loophole for large developers, especially if used in combination with offsets (see below). The SPD is an opportunity to narrow this loophole by limiting the cases where developers can use Allowable Solutions, for example by significantly increasing the evidence burden to show that onsite carbon reductions are not feasible or viable (see above under ‘Incentives’).</p> <p>The Allowable Solutions “Zero Carbon Route” was part of the Zero Carbon Hub’s Zero Carbon definition which was withdrawn by the government in 2016 and should not be used in any case.</p>	<p>The SPD has been revised to update the position regarding allowable solutions carbon offsetting scheme that has been withdrawn. Alternative carbon off-setting measures are only likely to be sought where proposals do not provide at least 10% of energy demand from decentralised and renewable energy sources (Policy CS24-b).</p>
67		<p>Section reference: Paras 4.13 and 6.19 and Sustainability checklist – 10% decentralised renewable energy</p> <p>The Sustainability Checklist and para 6.19 should include the word “decentralised” or similar to ensure that the requirement in 4.13 is met through local renewable production and not grid power under green tariffs. The wording in 4.13 could be edited to encourage a higher percentage where roof space or other features allow</p>	<p>Wording has now been deleted due to restructuring of the document, but reference to the policy requirement is set out in the SPD.</p>

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68		<p>Section reference: Paras 4.14 and 5.5-5.6 and 6.53 - Offsetting</p> <p>We are highly sceptical about the contribution of carbon offsetting to meeting global GHG emissions reduction and agree with the ‘last resort’ language in 5.5. This should be repeated in para 6.53.</p> <p>Section 4.14 should also be amended to clarify that developments which can only meet the requirements of CP24 by using ‘allowable solutions’ that involve offsets are unlikely to be approved.</p> <p>‘Offsets’ from avoided emissions have no carbon drawdown benefit but can be used (or misused) as an excuse for new emissions and therefore increase GHG concentrations. Offsets linked to carbon sequestration should be used only as a last resort, and only when the term of sequestration and its verification can be assured.</p> <p>Many offset schemes don’t achieve the reduction or avoidance promised and some can engage in double-counting. Another criticism focuses on whether the amount paid reflects true cost of offsetting. And even if you ignore the cost, many commercially available carbon-offsetting schemes are based on a 60-year duration, which may not be sufficient or effective when a building/project is emitting the carbon today or as greater longevity. A lot can go wrong with offsetting schemes. A tree-planting scheme might seem like an obvious low-risk option but will the trees in the right location? Will they grow to maturity and not be felled or damaged prematurely? What protection and safeguards are in place for the lifetime of the scheme? What’s more, avoidance or reduction amounts attributable to a particular project are hard to measure. This complicates the goal of balancing the carbon emissions with the same tonnage of carbon offsets. In sum, only real solution is to avoid the emissions in the first place.</p> <p>A similar logic applies to the use of biodiversity offsets and para 4.33 could be amended to encourage that the concept of Biodiversity Net Gain is only minimally used.</p>	<p>The SPD has been revised to update the position regarding allowable solutions carbon offsetting scheme that has been withdrawn. Alternative carbon off-setting measures are only likely to be sought where proposals do not provide at least 10% of energy demand from decentralised and renewable energy sources (Policy CS24-b).</p>

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69		<p>Section reference: Paras 4.18-4.21 and 4.31-4.33 – Carbon sequestration, Rewilding and Restoration</p> <p>Para 5.50-5.54 contains useful information on how planting, hedgerows and wetlands can increase carbon sequestration. It could be supplemented by adding information about how developments can support rewilding and restoration of ecosystems using nature-based solutions (see the response from PeCAN trustee Danny Lee on this subject). These outcomes should be referenced as supporting factors in the assessment criteria outlined in section 4 at the paras above.</p>	<p>The provision of GI on all proposals will be assessed against Policy CP28 Green Infrastructure of the Local Plan. Reference has been included to the Council's GI Strategy which identifies a range of opportunities for enhancing the existing GI network and the delivery of new GI.</p>
70		<p>Section reference: Para 4.18 – ‘Passiv’ definition</p> <p>It might be useful to highlight the difference between Passive design as stated and Passivhaus https://www.passivhaustrust.org.uk/guidance_detail.php?gld=41</p>	<p>Reference to Passivhaus has been deleted – the SPD encourages the application of passive design principles.</p>
71		<p>Section reference: Paras 4.33 – Biodiversity net gain</p> <p>We would support the inclusion of a new section on using Nature-based Solutions, as proposed in Danny Lee’s response to this consultation, which includes suggestions for text to be added in various places in the SPD and a reference to https://www.ukgbc.org/wp-content/uploads/2020/08/Naturebased-solutions-to-the-climate-emergency.pdf.</p> <p>No two ecosystems are the same and established habitats can never be fully replaced. 4.33 should be amended to ensure that Biodiversity Net Gain is not used as a tool to turn avoidable nature losses into a simple business cost.</p>	<p>Reference to BNG now included.</p>
72		<p>Section reference: Paras 4.33 and Carbon Reduction Statement – Trees</p> <p>We support the comments submitted separately by PeCAN committee member Melanie Oxley that the SPD should increase the protection of mature trees. The SPD requires at 4.33 that the carbon effects from their removal are counted. This section could be strengthened by incorporating as a requirement in section 4 the guidance in 5.52 that</p>	<p>Policies CP20 Landscape and CP21 Biodiversity provide the respective protection of trees. It is considered the SPD sets out the appropriate guidance regarding retaining existing trees and hedgerows as part of landscaping and GI provision.</p>

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		<p>“existing trees should be preserved, if appropriate, in developments and landscaping designs, wherever possible”.</p>	
73		<p>Section reference: Paras 3.9, 4.8 – 4.10 – Part L update This is now out of date as the government published an uplift to Building Regulations Part L (Energy) in Dec 21, coming into force in Jun 22. This will result in a reduction in 31% in emissions from current levels. This is a pre-cursor to the full Future Homes Standard being announced in 2024 and coming into force in 2025. Given the timeline of the revisions to the local plan, it would be appropriate to reference this standard instead of the previous one.</p>	<p>The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations.</p>
74		<p>Section reference: para 4.39, 4.44 and section 5 – Embodied Carbon This section in chapter 4 does not refer to embodied carbon. It should include this term and encourage applications to demonstrate the guidance set out in 5.85-5.99. The text in Section 5 on embodied carbon is very useful. We could suggest some additional resources: LETI has produced supplementary guidance in the form of the LETI Embodied Carbon Primer. Further guides give advances in understanding of materials, Environmental Product Declarations (EPDs), and Cradle to Cradle techniques: CIBSE - Building Services Knowledge, Built Environment Carbon Database (becd.co.uk), Nature-based-solutions-to-the-climate-emergency.pdf (ukgbc.s3.eu-west-2.amazonaws.com),</p>	<p>Noted - guidance now referred to in appendix 2 'Further Guidance'.</p>
75		<p>Section reference: Para 4.43 and 5.94 - Demolition Paras 4.39 and 4.43 could be amended to require the design stage to optimise Design for Deconstruction by utilising the BRE methodology to minimise end-of-life diverting of materials to waste streams and attendant deconstruction impacts on the environment. See https://www.bregroup.com/buzz/design-for-deconstruction-helping-construction-unlock-thebenefits-of-the-circular-economy/?cn-reloaded=1</p>	<p>Chapter 4 now deleted but reference remains in (new) chapter 7.</p>

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76		Section reference: para 4.44 and 4.45 – Sustainability documents Document references could be confusing for applicants: the Local Planning Applications Requirements refers to a Sustainability Appraisals; paragraphs 4.44 and 4.45 of the SPD refer to Sustainability Statements; the rest of the SPD refers to a Sustainability Checklist. It is not clear if these are the same or different documents.	chapter 4 deleted, however wording in (new) chapter 9 has been revised for clarity.
77		Section reference: Section 4.49 and para 5.136 – Resilience and adaptation The Local Plan vision calls for a resilient Hampshire. Para 5.136 section refers to climate change impacts including hotter and drier summers, warmer and wetter winters, and an increase in heavy rain, storm events and flooding. Section 4.49 and its application to all the policies in Section 4 could be amended to match this range of impacts and state a clear planning preference for built and green infrastructure proposals that show resilience in these areas.	Comment noted – chapter 4 has been deleted and merged with other sections. No further changes proposed.
78		Section reference: Paras 5.123 – EV charge points The reference for new developments to have EV charge points where possible could be tightened; in principle there can be very few reasons why a new development that includes parking spaces should not be EV-ready from the start. Planning preferences could suggest that all developments meet at least the Whitehill & Bordon requirements (CSWB18) and include support for visitor charge points, universal sockets, public charge points and car clubs	Section regarding EV has been updated to reflect latest position RE building regulations and reference to relevant guidance. The SPD cannot set out additional policy requirements for EV charging.
79		Section reference: Paras 5.26 - 5.28 – Insulation materials The guidance on insulation could be expanded to include hemp and lime-based mixtures, and sheep wool insulation. Hempcrete continues to absorb CO2 throughout its life and simultaneously increases strength of the material. Hemp and lime mixtures can lock up approximately 110 kg of CO2 per m3 of wall. Sheep wool Insulation has an embodied carbon level of less than half of widely used cellulose insulation and one sixth of mineral wool. Higher uptake of these materials can create	It is not considered necessary to list types of insulation materials.

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		a local more natural and sustainable industry for the enormous energy efficiency demand in buildings.	
80		<p>Section reference: Paras 5.3 – Energy hierarchy</p> <p>An updated version of the Energy Hierarchy diagram shown in the Supplementary Planning Document Climate Change and Sustainable Building Supplementary Planning (peakdistrict.gov.uk) would be more helpful to both professionals and the community, although it may need amending to mention the fabric first approach and to remove references to mains-gas-powered CHP</p>	Comment noted. It is considered this section provides the necessary information, including reference to 'fabric first'.
81		<p>Section reference: Paras 5.68-5.79 - Green Infrastructure</p> <p>We also support Melanie Oxley's suggestion to include a target ratio for built environment : green infrastructure in this section.</p>	The SPD cannot introduce new policy requirements but further wording has been added in reference to Biodiversity Net Gain.
82		<p>Section reference: Section 6 – Electrification of Heat</p> <p>This section has the wrong emphasis. It discusses CHP and renewable energy sources before moving on to heat pumps. As our electricity grid has decarbonised significantly and will be completely decarbonised by 2035, the most important priority for buildings is to shift their heating and hotwater demand from gas (or other fossil fuels) to an electrical-based source. Heat pumps are currently the primary way to achieve this. Any other forms of renewable energy at a local level are helpful in terms of producing more renewable energy – but this is secondary if buildings are still combusting fossil fuels. The premise and emphasis of this section should be reworded accordingly.</p>	Paragraph 6.8 of the draft states '...it should be noted that new developments must be aiming to reduce carbon emissions to zero where possible, for example through the use of renewable technologies such as heat pumps'. This chapter is intended to set out the options for renewable energy for different scales of development. No change considered necessary.
83		<p>Section reference: Paras 6.12 – 6.16 – CHP out of date</p> <p>This section on CHPs is now out of date. A CHP system which uses gas should not be encouraged at this point as it will have a lifetime of perhaps 20-30 years. In that time, the electricity grid will have completely decarbonised and so should be the primary source of energy.</p>	Reference to renewable CHP has been included.
84	Hampshire Swifts	Request to include a 'swift-specific' policy in the Local Plan, including integral 'swift bricks' in the design of all new suitable developments.	Comment noted. Matter will be considered in preparing the new Local Plan.

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85	Energy Alton and Alton Climate Action and Network	<p>We find the section 2.15 'What is Climate Change' breathtakingly dry and omits any statement of the need for urgent and community wide action. The consequences of failure to deal with the impact of the climate emergency will be catastrophic for all communities including East Hampshire and this should be the clear context for this SPD. Readers need to understand that if the measures in the SPD are fully implemented, we will be on the path to avoiding the worst of the climate scenarios. The document must also make plain the determination of Councillors, the Planning Department and key community groups to rigorously use the planning system make the changes that are absolutely essential. The SPD fails to lead on this critical point.</p>	<p>The SPD refers to the Council's declaration of a climate change emergency in the district and the respective Climate change Strategy and considers this is sufficient context.</p>
86		<p>The SPD is comprehensive and by definition very general. It could apply to any local authority anywhere in the country except for the references to Joint Core Strategy for Whitehill and Bordon. However, this SPD only applies to the part of East Hampshire outside of the South Downs National Park and in particular to Bordon and Whitehill. Alton and the A31 settlements. We would like to see more direct references to this part of East Hampshire especially with regard to water resources, green infrastructure, transport and sustainable development.</p>	<p>The SPD is intended to provide technical guidance for proposals brought forward across the district rather than specify locally distinctive issues. Following further discussions with the Regeneration & Place Making Team, case studies Quebec redevelopment site addressing the performance gap and the Whitehill & Bordon 'green loop' as an example of green infrastructure and carbon sequestration have now been included in the respective sections of the SPD. Reference has also been made to the Council's Green Infrastructure Strategy and Renewable Energy study which identify opportunities for the delivery of GI and renewable energy in the district respectively.</p>
87		<p>Section 4.5 states that 'integrating sustainability considerations early in the development process can go some way to ensure that policy requirements can be achieved in a cost-effective manner'. We suggest that this is slightly re-worded to read: 'it is essential that integrating sustainability considerations early in the development process is</p>	<p>Section 4 now merged with other sections of the study.</p>

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		considered if these policy requirements are to be achieved in a cost-effective manner’.	
88		Sections 4.6 to 4.10 refers to the ability of LPAs to set energy standards for new homes over the existing requirements up to the equivalent of level 4 of the Code for Sustainable Homes. Putting this in the report is totally superfluous because level 4 of the Code sets a level of performance 25% above the 2010 edition of Part L of the Building Regulations and this is already going to be exceeded by the 30% improvement set out in the 2022 edition. The 2022 edition is due to come into force withing three or four months.	The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations.
89		Section 4.17 Under the section ‘Submission Requirements’ it states the ‘adequate information to show how the energy and carbon requirements have been met in the form of design stage SAP assessments and a schedule of low or zero carbon energy’. This should be amended as follows ‘adequate information to show how the energy and carbon requirements have been met in the form of design stage SAP assessments or other approved calculations from building physics modelling software programs such as Passivhaus’ to take account of the fact that SAP calculations become less and less accurate as properties tend towards the ‘Passivhaus’ standards that are require to reach a true zero carbon solution.	Chapter 4 now merged with other chapters of the study. The Council will seek the SAP calculations in accordance with government guidance.
90		Section 4.33 – The statement ‘removal of mature trees will need to be factored into the Carbon Reduction calculation’ needs further expansion to be meaningful.	Reference to the removal of trees factored into the CRS calculation has now been removed as there is no policy basis for this requirement.
91		Section 4.39-Materials. There is no mention in the SPD of the Circular Economy which is now a prominent issue nationally and its omission is a failing. The statement under section 4.39 that ‘the use of low carbon and well managed materials is expected in all developments’ is just not specific enough. The embedded carbon and re-cyclability of building materials is becoming a major issue and organisations such as LETI and the RIBA are developing specific approaches and programs to calculate	It is considered that sufficient wording relating embedded carbon and the reclamation, re-use and recycling of materials is provided in (new) chapter 7.

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		its effects. This section of the guidance need expanding to explain what is meant by the above statement.	
92		<p>Section 6 Renewable low-carbon local power and heating.</p> <p>This very detailed but broad section on renewable energy never gets to the point.</p> <p>It should specify the current energy demand for our communities, how much of that is from renewable sources and what is in the pipeline. It could calculate how much change of land use and growth of renewable technologies are required to meet our 2050 targets and the staged growth needed by say 2030. EHDC knows the limitations for the use of wind power and hydro in East Hampshire. It also knows the potential for solar, heat pumps and energy from waste (food and plant-based).</p> <p>The SPD could be much more enabling by setting the scene, proposing sustainable developments that would be welcomed and again providing incentives to encourage such applications.</p>	<p>The SPD cannot set out a strategy or targets for the provision of renewable technology in the district.</p> <p>The SPD does now signpost to the Council's Renewable Energy Study which identifies the potential for delivering renewable energy and existing RE sources across the district.</p>
93		<p>Naturally as groups lobbying to achieve zero carbon energy, we feel the aspirations of the report don't go far enough but we realise the limitations of how far local government can go at present in promoting this aim. However, since much that is within the document is unenforceable at present, we feel that the document should be more definite in giving incentives to ensure that applicants for planning consent follow this guidance similar to the following:</p> <p>Statements such as:</p> <p>'Applications where there are clear environmental aspirations and benefits will automatically be fast-tracked through the Planning at compared to those where the environmental aspirations have to be clarified.'</p> <p>'Applications that go beyond the current requirements would be more likely to be treated with a positive attitude and swifter approval on the</p>	<p>As noted in the document, the SPD cannot introduce new policy requirements. However the SPD sets out a range of best practice and methods for each topic and encourages them to consider these in the design of proposals through the submission of the Sustainability Checklist.</p>

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		part of the planners than applications which lack environmental ambition.' As proposed by PeCAN schemes that exceed the minimum requirements and offer low carbon solutions such as heat pumps could pay less in CIL contributions.	
94		<p>Finally: Whilst we could query the wording of some of your definitions of words in the 'glossary' we must correct you when they are clearly wrong as is the case of the definition of Passivhaus.</p> <p>You state that a Passivhaus 'is a building in which thermal comfort can be achieved solely by post-heating or post-cooling the fresh air flow required for a good indoor air quality, without the need for additional recirculation of air'. Whilst most Passivhaus design incorporates MVHR (Mechanical Ventilation with Heat Recovery) this is not the essence of Passivhaus, indeed it is occasionally not the case. The true definition of a Passivhaus is 'a building that complies with the requirements of the Passivhaus Institute in Germany. To gain Passivhaus accreditation the building must have a heat loss of no more than 15KWhs per annum per square metre of surface area calculated using their sophisticated thermal modelling program.</p>	Comment noted - Passivhaus has been deleted as the SPD only refers to passive design principles.
95	Southern Water	Section 5 Water Resources	
96		We support the sustainable design approach set out in paragraphs 5.29-5.41 which outline water efficiency measures to be adopted in the design and construction of new development. This is because greater water efficiency in new development can also help reduce the wastewater output into the sewer network when compared with equivalent numbers of new developments which are not water efficient. In some locations this can help existing capacity in the sewer network to 'go further' before expansion becomes necessary.	Support welcomed.

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97		<p>As set out in paragraphs 5.37-5.38, rainwater collection, storage and reuse can help to reduce reliance on potable water supply thus increasing the water efficiency of new development. In addition to contributing to water efficiency, rainwater harvesting could have the added benefit of helping to mitigate sewer flooding by intercepting rainwater that may otherwise run off hard surfaces into the sewer network, or cause flooding elsewhere. However, this additional benefit, which is effective during heavy and/or prolonged rainfall events, has limited or no effect if rainwater storage butts or tanks are already full. We would therefore suggest that for certain types of application it may be beneficial to introduce 'leaky' storage butts (or smart rainwater harvesting), designed to release stored/unused water during dry weather, ahead of a predicted storm so that storage capacity is then available to attenuate the flow.</p>	<p>Wording added in chapter 5.</p>
98		<p>With reference to paragraphs 5.45 and 5.47, we fully support the requirements for developers to ensure that sewers will not be overwhelmed and cause flooding, and for SuDS to be the primary source of surface water management. As outlined in our Drainage & Wastewater Management Plan for East Hampshire, the risk of flooding from sewer systems is increasing due to climate change (see DWMP – East Hampshire), and the primary focus of the DWMP in many catchments is to limit the amount of surface water entering the sewer network. This will require a multifaceted approach to address existing issues, as well as ensuring future development does not exacerbate the problem. Requiring SuDS as the primary source of surface water management will help to achieve this, as well as 'smart' rainwater harvesting. Since 2020, water companies have become able to adopt certain types SuDS, and Southern Water is committed to this as we recognise the multiple benefits that effective SuDS and water reuse can have - further guidance on our approach is available online; suds-outline-guidance.pdf (southernwater.co.uk)</p>	<p>Comment noted.</p>

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99	Avison Young (Whitehill & Bordon Regeneration Company)	<p>In Section 2, the draft SPD notes at para 2.4 that SPD's cannot introduce new planning policies into the development plan - by including 'Climate Change' in the draft SPD title would seem to suggest that new planning policies are being introduced from the outset as there is no district wide climate change policy in the current development plan to elaborate upon.</p> <p>It is noted that there has been an increase in the number of SPD's being quashed following successful JR reviews as the offending SPDs have been deemed to be filling a current policy gap, which it is not the lawful role of a SPD to do.</p>	<p>Paragraphs 7.34 - 7.36 of the JCS states the respective policies referred to in the SPD help contribute toward addressing climate change mitigation and adaptation. As noted in the SPD, the role of the document is to provide guidance on the implementation of existing Local Plan policies on these matters.</p>
100		<p>Whilst the current development plan policies in Appendix 3 that the draft SPD is seeking to 'elaborate' on there is no simple way to understand how each policy is being subject to further definition/guidance in the draft SPD as sections 4 to 6 set out a long list/range of requirements which seem unrelated to Appendix 3 policies.</p>	<p>The Sustainability Checklist has been revised to clarify whether the information to be considered/submitted is a policy requirement or an optional standard and best practice that is encouraged by the Council that reflects the principles of the respective policy/policies.</p>
101		<p>More detailed comments regarding draft Section 2 include:</p> <ul style="list-style-type: none"> • the draft SPD would benefit from inserting EHDC's definition of mitigate, adapt and resilience as referenced in draft para 2.5. • it is inevitable that policies will (and not 'may' as referenced in draft para 2.6) change during the lifetime of the SPD. • the draft SPD would benefit from the identification of the specific challenges that EHDC faces in the context of the draft SPD. 	<p>It is considered that paragraph 2.5 is clear and no change is considered necessary.</p> <p>Paragraph 2.6 revised to 'likely'.</p> <p>The challenges are set out in the Local Plan and the District Council's and Hampshire County Council's respective climate changes strategies.</p>

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102		<p>More specific comments on draft Section 3 include:</p> <ul style="list-style-type: none"> • It is not clear from the draft SPD how the assertion in para 3.16 will be delivered i.e. how the council will reduce its emissions to net-zero? • Whether the Climate and Environment Strategy 2020 – 2025 and HCC’s Climate Change Strategy 2020 – 2025 have actually influenced the content of the draft SPD? • The conclusions set out from draft para 3.21 onwards would benefit from an assessment of how/whether current development policies ‘conform’ to the current/emerging policy context set out in this section. 	<p>Draft paragraph 3.16 - the information is set out in the Council's Climate Change Strategy. And the County Council's Climate Change Strategy.</p>
103		<p>Section 4 of the draft SPD sets out seven topic areas covering:</p> <p>i) Energy and Carbon Reduction</p> <p>It is noted that JCS policy CP24 seemingly requires new dwellings (as from 2016) to be built to level 5 of the former code for sustainable homes? It is unclear in the context of the draft SPD whether all new dwellings constructed in East Hampshire all meet code level 4? Or whether low or zero-carbon on-site JCS policy requirements are all similarly being met?</p>	<p>SPD has been revised to reflect the emerging changes to Building Regulations regarding energy efficiency standards.</p>

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104		<p>Since the JCS was adopted in 2014, WBRC has worked extensively with EHDC to deliver sustainability objectives/construction in a more comprehensive way - following the approval of a 'Green Measures' Strategy in 2016, new residential development in Prince Philip Park (PPP)(following planning permission being granted for the redevelopment of the former Bordon Garrison in 2016 app ref 55587/001 – the 'HPA') has met the requirements of this Strategy which sets out a range of options to deliver a sustainable community based on green living and working. The draft SPD should be updated to acknowledge the position for residential development in PPP, and also in relation to commercial/employment development in PPP. Such an acknowledgement also should apply to the other 6 topic areas in this draft SPD section and the approved EHDC/WBRC arrangements should be left undisturbed by the draft SPD, such that future RMA's pursuant to the HPA submitted to EHDC should be determined in accordance with that PPP Green Measures framework, rather than the draft SPD.</p>	<p>The SPD provides additional guidance and best practice but does not prejudice the delivery of proposals where alternative, suitable measures are proposed that are in accordance with the Local Plan.</p>
105		<p>It has also been established (again via numerous JR quashing of SPDs) that the resultant outcome of a SPD cannot result in financial burden being imposed on developments to come forward.</p> <p>Whilst draft paragraphs 4.4 and 4.5 outline/relate to original JCS policies, it is over 7 years since the JCS was adopted and it is not clear in the draft SPD how the additional requirements being introduced in the draft SPD in any way conform to the previous viability considerations given back in 2014.</p> <p>The draft SPD does not allay concerns that the proposed introduction of additional requirements for applications proposing major residential development do not constitute the creation of additional financial burdens with the proposed introduction of a requirement to submit a Sustainability Checklist (will EHDC's application local validations guidance be updated?), a Carbon Reduction Statement , and a Construction Management Statement.</p>	<p>The SPD does not propose additional policy requirements. Wording throughout the document has been amended where optional standards/guidance was stated as being a 'requirement' in the draft.</p> <p>The Sustainability Checklist has been updated to reflect the revised wording and whether it is a policy requirement or optional consideration. The SC will be included on the planning application validation list.</p>

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106		<p>ii) Site layout, landscaping, urban form and building design Again, the submission requirements section would seem to require details to support an application instigating both a financial burden and seemingly unrelated to current JCS policies.</p> <p>iii) Water resources In the context of references to the LLFA, should Hampshire County Council be referenced as covering the EHDC area? Again, the submission requirements section would seem to require details to support an application instigating both a financial burden and seemingly 'topping up' on current JCS policies.</p>	Reference added in relation HCC guidance in chapter 5.
107		<p>iv) Green Infrastructure and Ecology Is EHDC using ecology and biodiversity as interchangeable terms but meaning the same thing – this could cause confusion and there needs to be consistency in the draft SPD?</p>	Comment noted - wording revised where necessary.
108		<p>v) Resources, materials and waste Paragraph 4.45 refers to both a Sustainability Checklist and a Sustainability Statement, and also a Construction Management Statement (is there a template for this Statement?) - again, the submission requirements section would seem to require details to support an application instigating both a financial burden and seemingly 'topping up' on current JCS policies.</p>	Please see comment above in response to policy requirements. Further clarification regarding planning application requirements are set out in Chapter 10.
109		<p>vi) Development location Paragraph 4.47 uses the term 'where appropriate'. This would seem to suggest that in some instances completion of the checklist is not mandatory – which instances? Development location isn't just about buildings and needs to consider place making in the round.</p>	Chapter 4 has been merged with other sections of the document. Further clarification regarding planning application requirements are set out in Chapter 10.

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110		<p>vii) Climate change adaptation Again, the submission requirements section would seem to require details to support an application instigating both a financial burden and seemingly ‘topping up’ on current JCS policies. In draft paragraph 4.58 there is reference to planning permission being refused if the new/expansive range of SPD information requirements are not submitted to support an application as being contrary to planning policy – is that a logical position? It is unclear in the draft SPD as to how disagreements about the quality/technical information submitted climate change/sustainable construction will be dealt with in the determination of planning applications? In draft paragraph 4.59 there is a generic reference to the use of planning conditions - greater clarity is needed regarding potential draft conditions and EHDC could prepare a set of model conditions it will seek to impose.</p>	<p>Chapter 4 has been merged with other chapters of the document. Further clarification regarding planning application requirements are set out in Chapter 10.</p>
111		<p>Section 5 of the draft SPD introduces Sustainable Design and Construction Guide measures, which from the outset appear to go significantly beyond elaboration of current development plan policies. More specific comments/concerns/queries in draft Section 5 include:</p>	
112		<p>5.11 what does ‘encourage’ mean in SPD terms, when BREEAM Communities are encouraged?</p>	<p>It is the Council's preferred method for achieving sustainable development on large development schemes.</p>
113		<p>5.18 whilst there is reference to buildings should be designed to enable, and not impede, future retrofit measures that improve energy efficiency or allow the use of zero carbon energy, there is no guidance on what design standards EHDC envisages, and what needs to be demonstrated to EHDC to satisfy this point on design?</p>	<p>This should be read in conjunction with chapter 7 - notably 'materials'.</p>

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114		5.40 clarity on what EHDC means by larger scale developments and what water recycling systems EHDC envisages in the context of this para – perhaps an example would help clarify EHDC’s thinking on this matter?	It is considered the wording set out in (draft) paragraphs 5.39-5.41 is sufficient.
115		5.41 similarly EHDC needs to better define what it envisages in terms of ‘back up’ measures which has the potential to impact on the land-take to incorporate into new developments, and in also to impact in financial terms to be able to maintain the ‘back up’ system?	Reference is made to the back-up mains supply. financial consideration will be a matter for the developer when considering the use of such a system .
116		5.42 in the first sentence reference to ‘flood-risk’ needs to be defined as to what EHDC is envisaging in the context of this section?	No further definition considered necessary.
117		5.44 it is noted that whilst there may be benefits with permeable hard surfacing, permeable paving for example is not a material that will be adopted by HCC in new developments	The Hampshire Local Flood and Water Management Strategy refers to relevant Susdrain guidance, and permeable paving.
118		In the heading preceding paragraph 5.48 there seems no definition of the term ‘ecology’?	No definition required - however title revised to green infrastructure
119		5.51 outlines carbon capture but not what EHDC is envisaging to be required, or any evidence base to outline suitability?	The clear benefits of carbon capture/sequestration are set out in the SPD.
120		5.52 whilst this paragraph notes that evergreen trees will also be helpful as part of planting and landscaping plans, to help with carbon capture during winter months this may be seen as contradicting EHDC’s guidance regarding the incorporation of native planting in new schemes	Each proposal and the environment to suit the proposed tree planting will be considered on a case-by-case basis.
121		5.54 additionally, whilst there is a requirement for trees to need maintenance to ensure that carbon is not released back into the air, for example through decay or burning, trees do need to be cut down as part of their management which EHDC should overtly recognise.	Comment noted however it is not considered necessary to address the issue of maintenance in SPD.

ID	Respondent	Response Summary	EHDC Officer Response
122		5.58 EHDC notes that trees should be considered for landscaping designs to provide shading for people and wildlife, and species with a denser foliage, or which provide a dappled shade, should be considered, such as London Plane, Field Maple, or Oak, it is noted that these are relatively slow growing and the SPD should avoid naming species as it should be about the providing the right plants in the right place.	These are examples but it is recognised that the right trees should be planted in the right environment.
123		5.68 there needs to be a consistency in terminology with the introduction of 'flora and fauna'.....	Words are considered suitable in this context - no changes needed.
124		5.69 some native species are tolerant to climate changes and should be considered as part of the planting proposal for a scheme. However, there are some notable less tolerant exceptions to this – how is EHDC going make planning judgments on what is appropriate?	Informed in consultation with County ecologists.
125		5.78 this isn't necessarily correct as trees should not be retained at all cost.	Wording amended for clarity.
126		5.79 EHDC's aspirations are recognised but the delivery of district heating systems can be a very expensive proposition.	Comment noted.
127		5.121 the impacts of providing EVCPs will need to be considered in the context of creating significant power supply issues to accommodate.	Comment noted.
128		5.133 more could made to explain the people/community benefits and on site or off-site provision should be considered alongside viability associated with long term management.	It is considered that the benefits are set out in (draft) 5.133 - the management and long term management are considerations for when such a scheme is proposed informed by the referenced guidance.
129		Section 6 The introduction to this section should note that the current power network is under stress and sufficient power is not available without off-site reinforcement, which supports the argument for more decentralised systems and local generation of energy.	Reference has been made to the Council's Renewable Energy Study regarding the existing context and potential for delivering renewable energy in the district.

ID	Respondent	Response Summary	EHDC Officer Response
130		6.12 the source of suitable fuel sources for CHP is an important consideration	Wording revised to include preferred use of renewable CHP.
131		6.32 is EHDC a suitable location for turbines in terms of predicted wind flows to generate?	The Council's Renewable and low Carbon Energy study identifies some potential for wind energy generation in the district - guidance on this option should remain in the SPD.
132		6.45 are there sufficient water bodies in East Hampshire to even be worth considering this?	The potential for the use of GWSHP in EHDC has been reviewed and reference has been deleted.
133		6.50 is this different to heat recovery?	It is considered that the SPD makes clear the difference between the technologies.
134		6.57 the need for an energy statement - how does this relate to the Carbon Reduction Statement and Sustainability Statement?	Reference deleted.
135		Would Section 6 benefit from the inclusion of a conclusions section? This could include reference to EHDC will exercise the planning judgments needed to consider the associated on-going management and ownership of the technological solutions proposed, attractiveness to homeowners and businesses to use them and the capital replacement, and perhaps reference to hydrogen technologies?	It is considered that the matters raised would need to be considered by developers in identifying the preferred technology. Hydrogen technologies are in their infancy and so have not been referred to, however the Local Plan and SPD does not preclude their use in the future.

ID	Respondent	Response Summary	EHDC Officer Response
136	Historic England	<p>Paragraphs 5.26-5.28 discuss insulation appears to apply to both new-build and existing buildings and the section advocates the use of insulation as the cheapest and most effective method of reducing CO2 emissions, and energy needs. Measures identified consist of:</p> <ul style="list-style-type: none"> • Loft insulation; • Tanks and pipe insulation; • Cavity wall insulation; • Solid wall insulation; • Floor insulation; • Draught proofing; and • Double and triple glazing <p>Historic England recognises the urgent need for positive action on climate change and is committed to achieving net zero. However, some of above methods may not be suitable for traditionally constructed buildings and poorly conceived interventions are likely to result in the deterioration of the fabric of the building, resulting in higher carbon emissions in the long term, both through loss of building fabric and the resultant need to replace it, and worse energy performance. Furthermore, listed building consent is required for certain works to listed buildings.</p> <p>While paragraph 5.27 recognises that a balance should be struck between energy efficiency measures and other ‘design considerations’, this does not recognise the significantly different approach to energy efficiency that is required for traditional buildings, nor the statutory scheme that applies to listed buildings.</p>	Wording has been added (chapter 3) to reflect the comments and guidance.
137		The above should be remedied with insertion of a short section/chapter that briefly identifies the different approach to energy efficiency required for traditional buildings, with appropriate links to relevant guidance, such as that published by Historic England. This chapter/section should also be signposted in the section	See previous comment.

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		on insulation to reduce the likelihood of inappropriate or illegal works being undertaken.	
138		<p>We would recommend the inclusion of the following:</p> <ul style="list-style-type: none"> • Listed building consent is required for certain works to listed buildings (see Historic England Advice Note 16) • Consideration of how the building is constructed and how it was designed to function, with particular regard to heating, ventilation and moisture movement • Taking a whole-building approach to energy efficiency in traditional buildings (see the link below) • Signposting to Historic England’s suite of advice documents on Energy Efficiency and Historic Buildings. 	See comment 136.

ID	Respondent	Response Summary	EHDC Officer Response
139	Thames Water	<p>Climate Change and Water Efficiency</p> <p>The Environment Agency has designated the South East and Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used.</p> <p>Future pressures on water resources will continue to increase and key factors are population growth and climate change. We therefore support the separate section 8 on Water Resources in principle.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and this should be included in the SPD.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p>	<p>Wording has been revised to clarify that the alternative standard is 110 litres/per person/per day and reflects the standard set out in the National Housing Technical Standards, partly superseding the Code for Sustainable Homes.</p> <p>It is not the role of the of the SPD to provide supplementary policy wording or wording for planning conditions.</p>

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140		<p>Proposed policy text: “Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p>	
141		<p>Renewable Energy In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030.</p> <p>In 2018/19, Thames Water generated 22 per cent of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but to help meet the carbon zero target the use of more solar power is proposed on Thames Water’s operational sites and this should be supported in the SPD.</p>	<p>It is not considered necessary to include wording that reflects the current provision of renewable energy, however the SPD seeks the use of solar technologies.</p>
142		<p>Comments in relation to Flood Risk and SUDS Flood risk sustainability objectives should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It</p>	<p>It is considered that Policy CP25 addresses matters of surface water drainage.</p>

ID	Respondent	Response Summary	EHDC Officer Response
		must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	
143		<p>What Information Should be Submitted With an Application</p> <p>In line with the comments above , the application submission must confirm that:</p> <ul style="list-style-type: none"> • LLFA confirmation about the suitability of the SuDS • Statement setting out how the water usage of 110 l/p/d is achieved 	The Sustainability Checklist makes reference to the updated water efficiency standard.
144	Gladman Development Ltd	<p>Water Resources</p> <p>Through the SPD, the Council is seeking to implement the requirement for the delivery of the optional higher water efficiency requirements set out in Part G of the Building Regulations which restricts water consumption to 110 litres/person/day</p> <p>Gladman refer to annex 2 set out above, such standards can only be implemented via a Local Plan Review. The Written Ministerial Statement 2015 withdraws the Code for Sustainable Homes and as such these standards cannot be implemented unless clear local need has been identified through Local Plan policies requiring new dwellings to meet the tighter optional requirement of 110 litres/person/day. Gladman recommend that reference to the optional requirement is deleted until it has been implemented following a proper review of existing Local Plan policies.</p>	The supporting text to policy CP26 Water Resources / Water Quality states 'In light of further supporting the twin-track approach, the Environment Agency has demonstrated that it is possible to achieve Level 3 of the Code for Sustainable Homes (105 litres per head/day) in a new building at low cost.' Therefore the 110 litres/per head/day is marginally less than the minimum requirement set out Policy CP24 under the now withdrawn CfSH Level 3 which has been superseded, in part, by the National Housing Technical Standards. Wording has been included in the SPD to clarify this position.

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145		<p>Electrical Vehicles</p> <p>In principle, Gladman would support the decision to implement charging points for electrical vehicle charging so long as they do not jeopardise development viability. The SPD suggests at paragraph 5.124 that the developer may need to plan for increased power supplies and should provide the advance provision of cabling and ducting in line with national planning policy. Gladman remind the Council that the developer will not be responsible for implementing increased power supplies as this would be the responsibility of the infrastructure provider. Furthermore, the SPD states at paragraph 5.126 that the charge points must have a minimum power rating output of 7kw unless technology advances and this advise is superseded. To ensure development viability, the Council will need to contact energy providers to assess whether existing infrastructure is capable of handling electrical load and whether the implementation of charging points is feasible.</p>	<p>Wording relating to EV charging has been amended with reference referred to current guidance.</p>
146		<p>Gladman further remind the Council that the SPD should not set out new technical standards over and above what is required by planning policy and as such the approach taken in the SPD goes beyond national policy in seeking to implement these standards. It is recommended that the SPD is reworded so that electrical charging points is at the discretion of the developer rather than as a specified policy requirement until such time that this requirement has been considered at examination in public and viability evidence has been tested.</p>	<p>Wording has been amended to reflect the emerging changes to the Building Regulations requiring the provision of EV charge points.</p>

ID	Respondent	Response Summary	EHDC Officer Response
147	Hampshire County Council	<p>The Hampshire Minerals and Waste Plan (HMWP) is referenced in the SPD in Section 3. Within paragraph 3.19 and the included bullet point list, how the HMWP provides opportunities to mitigate climate change is explained, however, we would like to see that the prior or incidental extraction of minerals from development sites is included as a sustainable construction practice. These types of extraction, when utilised properly, can reduce the importation of other minerals onto development sites, as well as prevent the needless sterilisation of valuable mineral resources. The principle of incidental extraction also pushes the re-use of minerals excavated as part of the construction works, reducing the amount of waste sent to landfill and providing a more sustainable use of resources.</p>	<p>The Council consider that this would form part of the planning application process in consultation with the County Council if the site is situated within the minerals consultation/safeguarding area and so no additional wording is considered necessary.</p>
148		<p>Within Section 4, specifically the Materials paragraphs 4.39 – 4.45, we would like to see the inclusion of a statement surrounding the consideration of prior extraction of minerals and the use of incidental extraction within planning applications, where appropriate. Both of which can provide materials for use in construction as well as prevent the needless sterilisation of valuable mineral resources.</p>	
149		<p>The Planning Policy Team were pleased to see the inclusion of the Waste Hierarchy and its principles in Section 5, 5.80 – 5.82. In the Sustainable sourcing of materials (including local and re-use) paragraphs, 5.89 – 5.90, we would like to see mention of the opportunities of prior and incidental extraction, on appropriate sites, that can reduce the need for importation of materials by providing useable minerals from the development site itself as well as prevent the sterilisation of minerals resources.</p>	<p>Wording added in (new) chapter 7.</p>

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150	Ministry of Defence	<p>DIO safeguarding have an area of interest in RAF Odiham and the statutory Aerodrome Height and Birdstrike safeguarding zones surrounding the aerodrome. A further area of interest is the Technical Safeguarding Zone surrounding MOD Oakhanger. We have an additional interest in the Longmoor Ammunition Compound with statutory Explosive safeguarding zones surrounding the site.</p> <p>The aerodrome height and technical safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.</p> <p>Additionally, within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate birdstrike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect, this can include landscaping schemes associated with large developments, such as the provision of green roofs, as well as the creation of new waterbodies and drainage systems. Sustainable Urban Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development.</p>	<p>Comments noted. The MOD would be consulted, as a statutory consultee on planning applications, on relevant proposals within the safeguarding zones as set out in the consultation response and for proposals of wind turbines with a tip height of 11m, also as noted in the consultation response. No changes to the SPD are considered necessary.</p>

ID	Respondent	Response Summary	EHDC Officer Response
151		<p>In summary, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused. Further to this, we request to be consulted on any development within the Explosive safeguarding zones; the Inhabited Building Distance (IBD) and the Vulnerable Building Distance (VBD) that surround the Longmoor Ammunition Compound. The MOD should also be consulted on any applications for development within the statutory Technical safeguarding zone surrounding MOD Oakhanger and within the Aerodrome Height safeguarding zone that surrounds RAF Odiham, which consists of structures or buildings exceeding statutory safeguarding criteria.</p>	
152	CPRE South Downs & Central Planning Group	<p>CPRE Hampshire has reviewed the draft SPD. We recognise that scope for imposing requirements relating to climate change in planning decisions is limited by the terms of the policies in the adopted Local Plan. We look forward to new policies in the emerging Local Plan which will better reflect the Climate Emergency declared by EHDC. Hopefully, stronger policies in an updated NPPF will facilitate this. Meanwhile we see this SPD as a step in the right direction. One point of concern is the absence of specific targets. Without these we fear the SPD may not achieve its objectives.</p>	<p>Comments noted. The SPD cannot set out additional policy requirements, standards or targets relating to energy efficiency standards and reduction in carbon emissions. The new Local Plan does provide an opportunity to consider such matters further.</p>

ID	Respondent	Response Summary	EHDC Officer Response
153	██████████	<p>Objective 5 states that we must make use of existing housing stock.</p> <p>1. Could the Council please provide the figures for homes by number of bedrooms in Alton and District where considerable new houses have been built in the last ten years? The reason for this development is primarily because we are outside the National Park and the government has been setting targets for new houses.</p> <p>2. Has the Council done a survey of the environmental needs of the existing housing stock with regard to insulation, solar panels, replacing oil and wood burning stoves, smart meters and of course electric vehicle charging points? The priority must be to support improvements in the existing housing stock and of course the new builds in the last five years should have been built with the environment in mind.</p>	<p>Data on housing completion can be viewed in the Council's Authority Monitoring Report available on the Council's website.</p> <p>The Planning Policy Team are not aware of such a survey being undertaken.</p>
154		<p>Objective 19 states new development to be built to a high quality that promotes the use of sustainable resources in developments.</p> <p>1. We are currently working to a 19% reduction in emissions from a new home build.</p> <p>2. In 2022 this will be increased to a 31% reduction. How will this be measured and why is it not 50%?</p> <p>3. As we do not need many more new homes built in Alton & District after the existing brown field sites have been developed in Alton Town Centre surely the focus of the Council should be on the existing housing stock and the conversion of unused retail & office sites to houses?</p> <p>4. It is not clear from the policy what the requirements are for using shared green energy sources (solar panel farms, heat pumps etc) are. Can this section be enhanced?</p>	<p>The 31% reflects the standard to be introduced through a change in the Building Regulations in June 2022.</p> <p>It is not the role of the SPD to address housing provision. The new Local Plan will explore opportunities and policies regarding housing provision and opportunities for redevelopment of brownfield land.</p> <p>Policy CP24 of the Joint Core Strategy sets out a requirement of 10% on-site renewable energy.</p>

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155		<p>Objective 21 states to prevent development resulting in unacceptable levels of air, noise, land, light or other pollution.</p> <p>1. The major pollution in Alton & District is the excess levels of car traffic and the absence of alternative green transport options. What plans does the Council have to do something about this before adding more houses?</p> <p>2. The size of the houses being built dictates how many vehicles are likely to be parked outside the property and the extent of the traffic congestion and air pollution.</p> <p>3. How are we going to stop children being driven to our schools in polluting large cars?</p>	<p>Policy CP31 of the JCS requires proposals to include a range of mitigating measures relating to transport provision and active travel/sustainable transport measures.</p> <p>All proposals need to provide appropriate parking provision in accordance with Policies CP29 and CP31.</p>

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156		<p>Objective 22 is to address the causes of climate change and ensure that the district is able to adapt to it within environmental constraints.</p> <p>1. The first cause of climate change in Alton District is the destruction of multiple carbon capture sites (forests, woodland, individual trees in gardens, hedgerows and wetlands critical to carbon storage? What environmental protection can we expect for these important sites from development? There appears to be little in the document concerning the removal of hedgerows and replacing them with fences?</p> <p>2. The second cause of climate change in Alton District is the excessive use of fossil fuels. We have a high percentage of properties with wood burning stoves, barbecues and patio heaters. We still have some properties where coal and oil are the main sources of heat. We have a low percentage of houses with solar power and very few heat pumps. What plans does the Council have for conversion away from fossil fuels?</p> <p>3. The extremely high car ownership and the low incidence of electric vehicles in Alton & District is a significant issue. This is made worse by the majority of our working population commuting to other Towns and Cities for work. The transport infrastructure and public transport options in Alton & District are very poor and have never been considered when all the new housing developments have been planned. What schemes does the Council propose to provide the infrastructure for the large retired population to give up their cars and either move into the Town Centre, go electric or use public transport?</p> <p>4. Paragraph 4.48 relating to JCS policy CP31 is critical to Alton & District and needs to be enhanced significantly.</p>	<p>Policy CP20 Landscape of the JCS protect and enhance natural and historic features which contribute to the distinctive character of the district's landscape - including hedgerows. The SPD makes reference to the preferred retention of hedgerows as part of landscaping and wider green infrastructure provision.</p> <p>Change will be delivered nationally and locally in accordance with national standards, notably future changes to Building Regulations in relation to energy efficiency.</p> <p>As noted above, Policy CP31 seeks a range of interventions to encourage the use of more sustainable modes of transport. The SPD now makes reference to the emerging change in Building Regulations which will require EV charge points and infrastructure for a range of development types.</p> <p>Chapter 4 has been merged with other sections of the document, however the guidance applies to the district as a whole.</p>

ID	Respondent	Response Summary	EHDC Officer Response
157	The Coal Authority	As you are aware, East Hampshire District Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	Noted.
158	Bramshott and Liphook Parish Council	The SPD could greatly benefit from being more compact, with all references etc. consigned to an appendix and thus leaving Sections 3 and 4 as the primary sections for review. The document lacks an executive summary laying out the key objective of the SPD and the actions called for. Section 4 has a mix of clear objectives (e.g. numerical targets), and objectives with wording that is vague and aspirational and thus cannot be measured or enforced.	Comments noted. The document has been restructured to set out clear chapters relating to each topic. It should be noted however that the document is technical guidance covering a range of matters. Footnotes have been used to provide references, in addition to being captured in the appendices.
159		Overall the document should be restructured such that it is clear what is being asked for; how EHDC will apply those measures; and how EHDC will ensure compliance. The executive summary should also include a list of the accrued benefits if these measures were applied, i.e. assuming 300 new homes are built to the new standard this will result in a x% reduction in CO2 etc.	The SPD needs to be read in conjunction with the Local Plan and respective policies. The Sustainability Checklist is intended to provide a simplified list of requirements/standards developers should or may wish to consider that reflects the document structure and sub headings.
160		Whilst this SPD is full of good words, it lacks substance regarding Passive design. The policy should require certification from Passivhaus schemes. This ensures that the measures taken are effective and, without this, many properties will continue to fall below the planning standards as there is no regulation of the post occupancy performance.	There is no Local Plan policy that requires Passivhaus schemes and so this standard cannot be requested. The SPD does however encourage the consideration of passive design principles.
161		In terms of Biodiversity, this should also be subject to post occupancy evaluation to confirm that a 10% net gain had been achieved at 5 years after occupation.	The SPD cannot set this requirement, but all BNG provision will need to be delivered in accordance with emerging national policy and guidance.
162		The ambition for this is not very high, given the duration of this plan, and as a scheme approved at the end could be built in 2029 the targets should be closer to Net Zero and full Passive design.	The SPD cannot set standards to replace the now withdrawn Code for Sustainable Homes or 'require' passive design to be incorporated into schemes.

ID	Respondent	Response Summary	EHDC Officer Response
163		The SUDS section is limited. There should be stronger wording to promote Blue / Green drainage solutions rather than SUDS. There is a useful reference to CIRIA which produced a good manual, however house builds still like using simple underground tanks.	In conjunction with the respective Local Plan policy (CP25 Flood Risk), the Council considers the wording in the SPD in relation to SuDS to be proportionate. Reference to the relevant Susdrain guidance has been added.
164	[REDACTED]	Energy recovery facilities – yes, but not to the proposed plant in Holybourne on A31 – wrong place and not designed for local benefit.	Comment noted.
165	[REDACTED]	Restoration of quarries: this can be good, but the present day geology student is at a severe disadvantage in having very few inland geological sites to study exposed strata now quarries are neglected and vegetated, closed through health and safety etc. leaving field work on the coast with attendant dangers. Maybe some old quarries could be recreation sites such as the use of gravel pit lakes along the Thames Valley e.g. Dinton Pastures near Reading. There are even geology theme parks.	Comment noted. Statement refers to the Minerals and Waste local Plan - no change needed.
166	[REDACTED]	Flood plains are needed for water attenuation/flood risk, not housing. Follow advice of Environment Agency that has too often in the past been ignored.	Relevant proposals will be subject to flood risk assessments and in consultation with the EA.
167	[REDACTED]	4.5 Early involvement of sustainability in first design brief is good and needed, along with natural limiting factors. I question no restrictions for non-residential developments as they have equal importance in sustainability.	Comment noted.
168	[REDACTED]	4.18 CP27,29 & CSWB5 Passive design – good for both sustainability and economics. We need to consider temperature extremes of cold and hot – joined up thinking on different issues. Also it is not a good idea to build houses in frost hollows, difficult to heat and in future for effectiveness of airsourced heat pumps that are likely to be employed in individual dwellings with limited ground.	Technical feasibility and design considerations will be a matter for the applicant informed by the guidance set out in the SPD.
169	[REDACTED]	4.20 Effect of development on neighbouring sites – good	Comment noted.

ID	Respondent	Response Summary	EHDC Officer Response
170		4.21 Risk of overheating – When walking through two recent new build sites in Alton, King’s View and Gaston Way in hot summer weather I have been aware of heat being reflected from the brickwork and also upstairs bedroom windows, particularly when built as dormers in roof space, are invariable fully open in the day. In Gaston Way development there are two green squares formed around mature oaks and sycamores with TPOs and one is aware how much cooler and more pleasant it is around them in hot weather. Environmental services.	Comment noted. The guidance in relation to passive design principles and tree canopy cover intends to address such issues.
171		4.22 Water We need to highlight the water-stressed nature of the south-east and how this will not change.	This is noted in the Joint Core Strategy and a matter being considered further in the new Local Plan.
172		4.27 SUDS – good but apply knowledge of geology and be aware of limiting factors on impermeable rocks/soils and proximity to near surface water table that reduce their effect. Advise planting of perimeter trees. SUDs also need to be at the lowest ground, not uphill as I have seen on some plans. It is all too easy to tick the boxes when seeking planning permission.	SuDS need to be prepared in accordance with the respective guidance referenced in the SPD and in consultation with the LLFA.
173		4.31 Green infrastructure – good, a win-win with pleasant living environment, recreation space, biodiversity, passive design through shade and shelter. A comment from a resident with a young family of the Garstons Way development in Alton was the very great benefit of the Barleyfield adjacent open space as the gardens are so small and enclosed.	Comment noted.
174		4.3 Biodiversity good	Comment noted.
175		4.43 Lifestyle, human behaviour change. This is really needed and could be taken up by schools too. It is their future.	Comment noted.
176		5.8 Layout of buildings very important to get away from “squash them in” to meet targets. A building has 100 year expected life span in which time the climate prospects will not be good. Future generations will not thank us for their heritage. Buildings are also places to be lived in.	Comment noted. Design and density considerations of new dwellings need to be delivered in accordance with the respective policies of the Local Plan.

ID	Respondent	Response Summary	EHDC Officer Response
177		<p>5.14 Trees on site. They perform many environmental and aesthetic services. More thought needs to be given to provide them with more space both above and below ground. British Standards on Trees is a compromise and active water-absorbing tree roots and their associated mycorrhizal fungi helpers (usually not far below the surface of the ground) extend twice as far as the canopy so can be adversely affected by trampling. Also tree roots can cause damage to water pipes so tree planting needs linking with service trenches and space given for them. All this is best done and co-ordinated at an early stage of the design process. Spaces on the Garston Way development Alton that could have trees planted invariable have manhole covers indication water pipes below. Other space needs preserving for trees.</p>	<p>Comment noted. It is considered that the SPD provides the appropriate guidance regarding tree planting. Reference to Woodland Trust guidance has been added.</p>
178		<p>5.32 Grey water – this can be useful for watering gardens – I use it. Redesign plumbing to hot and cold water basins and sinks to install separate electric heaters above hot water taps to avoid considerable wastage of cold water that goes down a sink in running the hot water tap. One of the Field Studies Council Centres, when providing wash basins in bedrooms of an ancient and large historic building, used this system.</p>	<p>Comment noted.</p>
179		<p>5.44 Heavy rainfall – good to make provision as this is forecast to increase. Also problems on hard surfaces on steep slopes e.g. King’s View in Alton steep access road in heavy rain the water overshoots the drains and flows across the road below, thence via gutters to King’s Pond carrying silt and pollutants and eroding the pond banks. Importance of topography.</p>	<p>Comment noted.</p>

ID	Respondent	Response Summary	EHDC Officer Response
180		<p>5.57 Biodiversity After “birds” add “insects and other invertebrates” as they power ecosystems by food chains. A long term study in Germany has shown the decline in numbers of insects – worrying. See Hallmann et. al, 2017. More than 75 percent decline over 27 years in total flying insect biomass in protected area, PLoS ONE 12 (10). Use native species of trees but check that they will grow on the local soil. Oak does not do well on chalk.</p>	<p>The SPD acknowledges that consideration will need to be given to the planting of the right trees in the right location, including consideration of climate change adaptation.</p>
181		<p>Green roofs – maybe we should encourage and leave moss on roofs instead of scraping it off. Research needed here.</p>	<p>Comment noted. Provision of green roofs ensure the correct ecology is provided in a managed way.</p>
182		<p>5.79 Ground-sourced heat pumps in school grounds – good. This is a direction that local authorities could lead in. However, if the elements of the pump are horizontal (saving a deep vertical borehole) space does need to be saved for trees and their roots to enhance the visual attraction of the school ground, provide teaching facility and shade. Need for interconnected thinking.</p>	<p>Comment noted.</p>
183		<p>5.81 Waste I see no mention here of circular economy of waste and increasing the range of things that can be recycled. See Maslin 2021 How to Save our Planet. We also need to select building materials that do lend themselves for recycling of waste bits and at end of life of building.</p>	<p>It is considered the SPD provides sufficient guidance on these matters.</p>
184		<p>5.82 Demolition - good to focus on alternative to demolition as existing earth materials used in a building.</p>	<p>Comment noted.</p>
185		<p>5.92 Long-lasting and durable materials – good but need to give examples. Many long-lasting materials are plastic, PVC etc. We need to think in manufacturing of the life history and ecology of the product and build in its future recycling into production and sales.</p>	<p>Reference to guidance on materials has been added.</p>
186		<p>5.117 Streets – trees are good but need space for their roots (beyond the canopy) and where they will not interfere with water pipes. A need to allocate a more generous percentage of each site for green infrastructure.</p>	<p>The SPD cannot set a % in relation to GI provision but all proposals will need to provide for GI in accordance with policy CP28 of the Local Plan.</p>

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187		5.113 Communal food growing – this is good but gardens these days are very small although much can be grown in pots. Unlike those of us brought up to “dig for victory” many people have never grown food. Provide links with ALFI (Alton Local Food Initiative).	Reference to ALFI added.
188		6.3 Energy We need more information on the geological limitations of ground sourced heat pumps. These would be good for large development sites, perhaps under some of their green infrastructure. They have been pioneered in Scandinavia so we need to learn from them. As part of human behaviour change, the younger generation are used to a high level of room heating. Renewable sources are not so energy intensive as old fossil fuels (and the current almost universal gas-fired central heating) so we will have to get used to lower room temperatures and wearing extra jumpers in winter, as some of us still do. Changes to human behaviour.	The technical feasibility of GWHP will need to be considered on a case-by-case basis.
189		9.0 Ground water – good, this is often misunderstood. Headwater springs of aquifers near the surface as in Alton give risk of groundwater flooding that cannot be stopped, only kept away from.	Comment noted.
190	Four Marks Parish Council	The document appears to be logical clear and concise and refers to standards produced nationally by expert bodies to be the minimum requirements. In conjunction with the Neighbourhood Plan Steering Group (NPSG) of Medstead and Four Marks Neighbourhood Plan (M&FMNP), and Medstead Parish Council, Four Marks Parish Council support the document as presented. Although would suggest that a legal opinion is sought to determine that the document would be robust if subject to a legal challenge.	Support welcomed. Comment noted. The document is considered to be legally sound.

ID	Respondent	Response Summary	EHDC Officer Response
191	Medstead and Four Marks Neighbourhood Plan Steering Group	<p>The view of the Neighbourhood Plan Steering Group (NPSG) of Medstead and Four Marks Neighbourhood Plan (M&FMNP) is that it supports the adoption of the Supplementary Planning Document.</p> <p>The Document makes clear statements about what ‘must’ be part of a design to gain compliance, especially with regard to the Energy Hierarchy and Zero emission development. The NPSG would encourage the Council to make sure these policy statements are enforced. Furthermore, where the Council is recommending that aspects ‘should’ be part of the design, the NPSG would encourage the Council to ensure that these policies are adhered to whenever possible.</p> <p>In Medstead and Four Marks, as one of the highest areas of the District, we are very much aware of the potable water starvation, both through loss of supply and low pressure. We commend the subsection on Water Resources, especially with regard to water harvesting and greywater.</p> <p>The section - Flood Risk, water run-off and Sustainable Drainage Systems (SuDS) is particularly welcomed, especially as there are several areas of the Ward that are severely effected by surface water runoff, particularly the Five Ways junction, outside Four Marks CofE Primary School, that can flood to become impossible to cross for school children, their parents and younger siblings, especially if passengers in buggies.</p>	<p>Support welcomed.</p> <p>All proposals will need to be in accordance with the policies of the Council's Local Plan. Wording in the SPD reflects where the standard / information to be submitted is a policy requirement.</p>
192	██████████	<p>You have invited comments on a very lengthy and complex document and I do not expect many individual East Hants residents will try to work their way through it as I have done. A simple summary of the main points would have been helpful.</p>	<p>Comment noted however the SPD is a technical document addressing a range of complex matters in relation to climate change and sustainable construction. The document has been restructured to remove duplication and provide distinct chapters relating to each of the topics.</p>

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193		<p>Solar panels: Our allowance of 4kW generating capacity is split equally between our East and West facing roofs. Your report does not mention the following advantages over the more common deployment on South-facing roofs.</p> <ul style="list-style-type: none"> · It spreads the period of useful electricity generation more evenly during the day and over a greater proportion of the daylight hours. · This time-spread is more appropriate for the powering of domestic appliances. · From the point of view of the national grid, this helps to mitigate the problem of a midday peak in solar generation. (Bearing in mind the commonplace fact that all the solar panels in the country operate in synchrony). · As a large part of the cost was erecting scaffolding on both sides of the house there would be great benefit in fitting the panels as the house was being built. Given sufficient longevity of the materials, roofing new buildings entirely with PV units (roofing tiles?) would be an obvious way forward. 	<p>It is considered the SPD provides sufficient guidance regarding the siting of solar panels</p> <p>The guidance is aimed primarily at new development, recommending renewable energy technology such as solar panels are fitted during construction.</p>
194		<p>Electric car</p> <ul style="list-style-type: none"> · Our PV panels generate between 2 and 3 kW for around 8 hours of a summer's day. As our electric car draws just under 2kW to charge from a 13amp plug in the garage, when we charge during the day in summertime we are literally driving on sunshine. · We find that few people are aware of this possibility, or of the fact that electric cars do not necessarily require the installation of a special high output charging point. · Thus we charged our little VW e-up from a simple 13 amp plug for almost all of its 27,000 miles (7 years) of local journeys. · We now have a long range Tesla as our only car, and are delighted to find that it is more efficient at charging from a 13amp plug than the VW used to be! – adding nearly 10 miles range in an hour of charging instead of 8. 	<p>Comments noted.</p>

ID	Respondent	Response Summary	EHDC Officer Response
195	██████████	<p>How will EHDC instigate the England Trees Action Plan, which states that the government is committed to ensuring the provision of safe and appropriate public access as a feature of as many woodlands as possible. With 30% of our land for biodiversity. Could you also make provision in this area on the Nature Recovery Network and Local Nature Recovery Strategy to increase opportunities to access nature, with appropriate Footpaths and Bridleways. It seems to me that this area is not all Brownfield site and therefore should have extra protection with regard to biodiversity despite it being sold. We have an ideal opportunity to rescue this area for future generations, we have to realise that any tree that is felled, reduces the biodiversity in the area. I do not believe in the long-term that felling thousands of non-native trees, keeping a few mature trees and then replanting (120,000 pledged saplings) does anything for biodiversity now. It might do in 50 years or so when the saplings grow, however, then another problem arises, that they will not be deemed mature and could be felled for further development.</p>	<p>Proposals are required to consider the provision of green infrastructure, including the retention and provision of trees as part of landscaping proposals in accordance with policies CP20 Landscape and CP28 Green Infrastructure. it is considered that the SPD provides sufficient guidance in relation to tree planting.</p> <p>The Council will work with Hampshire County Council in preparing LNRS to inform the preparation of the new Local Plan.</p>
196		<p>As a society we must protect our Right to Roam and be aware of Public Access, it should be displayed properly with appropriate signage. Hopefully the ELM, Sustainable Farming Incentive and Local Nature Recovery, Landscape Recovery and the Farming in Protected Landscape Schemes will all be included in the next Local Plan.</p>	<p>Comment noted.</p>
197		<p>As Whitehill and Bordon is now described as a 'Healthy New Town' I'm presuming it is because, of the efforts of the developers to build appropriate homes and providing SANGS. It has been good to see that the developers have received awards from the NHBC and should be congratulated. I have never been able to find out the exact number of homes that have been earmarked for Whitehill and Bordon as each document suggests a different figure. And, no one seems to know how many have already been built or will not divulge the number. With this in mind how can we make informed comments going forward?</p>	<p>More information can be found on the website: http://whitehillbordon.com/</p>

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198		Paragraph 5.110 Will EHDC be providing ample public transport for residents, if so, when? What is the time line to get this organised as it seems to be extremely late?	Proposals need to consider the provision of and accessibility to public transport in accordance with policy CP31. It is not the purpose of the SPD to set out a strategy for public transport.
199		We have the Green Loop for walking and cycling which is great. We have Shipwrights Way, which is also, for walking and cycling, however, part of it provides for Bridle way, then stops going through Bordon. Why was this omitted? It seems a discrimination towards horse riders, will you be able to rectify this on the next Local Plan?	This is not a matter to be addressed in the SPD - suggest contacting the W&W Regeneration Company.
200		Paragraph 5.133 Community Food growing. Does this include our Statutory Rights to an Allotment? As far as I'm aware there are two sites in Bordon, and a waiting list for both. I waited 2 years for a plot, it was overgrown and took a lot of work to get it back to full use. I realise that this is not EHDC responsibility to manage, and it is often the tenant that refuses to give them up, despite the Town Councils efforts. However, will the new Local Plan provide for more land to be used?	Allotment provision is one option. The new Local Plan may explore the provision of space for allotments or policies to address any identified need.
201		Will the next Local Plan provide wildlife flowers on the hedgerows, particularly the By-pass. This will encourage more species to the area.	The local Plan can only identify opportunities for GI delivery including rewilding.
202		We must not have repeat of the 'Cladding' problems. Will the new homes be fitted with the latest equipment?	Developments will be built in accordance with Building Regulations.
203	Abri Group	Abri is supportive of the broad thrust of this draft SPD in seeking to improve the quality of housing delivery across East Hampshire through improvements to sustainable construction methods and monitoring. The enhancement of core adopted policies with the latest proposed changes to the Building Regulations is supported as providing a clear steer to development now progressing through the planning system.	Support welcomed.

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204		<p>The proposed increase in validation requirements is similarly supported for providing a clear steer on the detail required to support development, with an appropriate level of flexibility and proportionality.</p> <p>These changes will bring the local list up to date and in line with other modern planning authorities.</p>	Comment noted.
205		<p>The Sustainable Design and Construction Guide includes a draft proposal at paragraph 5.140 to require post-occupancy monitoring of major developments to ensure 'as built' performance matches the calculated 'design' performance assessment. This requirement is considered excessive and a matter requiring detailed assessment, viability testing and robust consultation through an enhanced local plan policy, instead of supplementary guidance. We suggest that the Council conduct a thorough review on the ability to require post-occupancy evaluation through its emerging local plan, and instead look to whether pilot developments could be selected to review this proposal. It may also be more proportionate to set an expectation or target figure in policy of a reasonable percentage of large residential developments on which to collect data.</p>	Wording revised to 'request' post-construction testing.
206	<p>██████████ ██████</p>	<p>This SPD will require a re-drafting of the "Adopted East Hampshire District Local Plan Part 1: Joint Core Strategy for East Hampshire District to 2028", despite what is asserted in 2.4. Surely this new document cannot sit alongside one with which it is often in opposition?</p>	The SPD provides guidance on adopted Local Plan policies, including the Joint Core Strategy.
207		<p>There will need to be an expert-led survey of East Hampshire to identify and map the ecosystem services which will then need to be designated as 'not for development' and included in a revised Local Plan.</p>	Comment noted.

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208		Suggest that recently started and pending developments should be reviewed in light of this SPD from now, i.e.. these should be halted whilst applicant's evidence of climate change adaptability & sustainability is provided before they can proceed further.	All proposals will need to be considered in accordance with the development plan. Only once the SPD will the local validation checklist be updated to include the Sustainability Checklist which applicants will need to submit as part of the planning application process.
209		4.8 the aim for this Code is a 19% reduction in the Dwelling Emission Rate of carbon. I have not seen the calculations, but find it hard to believe this is enough to set us on the path to a 58% carbon emission reduction by 2030. I would like to be convinced this is backed up by analysis.	The SPD has been revised to reflect the change to the DER to a 31% reduction in Co2 soon to be introduced through a revision to part L of the Building Regulations.
210		4.11 It is wonderful to see BREEAM Excellent Standard will be applied to larger developments (over 500m2), but I cannot see why there should be "flexibility" on these standards for "community" or "simple building" developments. This is a potential loophole so it would be wise to apply the same standards to all development.	The SPD reflects the BREEAM standards and guidance.
211		4.13 New dwellings to provide at least 10% renewable energy. I believe this figure could be more ambitious, particularly in order to meet a 58% reduction in carbon emissions by 2030. In addition I am sceptical about "allowable solutions" and think this needs to be tightened up.	This requirement is set out in Policy CP24 of the JCS and cannot set an alternative policy requirement.
212		4.44 There is no mention here of the carbon emissions counted in building materials to be used, and it is not enough to speculate "use of sustainably sourced materials", though I note this is fully set out in 5.85.	chapter 4 has been deleted and merged with the respective chapter in the SPD. There are no policy targets, at present, relating to embodied carbon.
213		The Section on Urban Form and building design is very good and I see a Sustainability Checklist is to be completed, but it is not clear how completed forms will be evidenced.	The Sustainability Checklist has been updated to request that applicants identify which studies / evidence include the requested information.
214		The Section on Water Resources is very good and I am pleased to see that SuDS and other water conservation measures are included here.	Comment noted.

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215		4.32 Green Infrastructure pointers are well-made, though I am disappointed these are not given greater prominence.	The document has been restructure and each topic now has its own chapter in the document. The Council considers the SPD provides a range of guidance relating to GI.
216		4.33 The Carbon Reduction Statement includes “proposed removal of mature trees that need to be factored into the carbon reduction calculations”. This does not provide the necessary protection that must be afforded to mature trees. Every effort, at the design stage, must be made to keep existing mature trees above the Forestry Commission requirement for notice to fell, whether the trees in question have TPOs or not. The wording under 5.78 is more robust.	chapter 4 now merged with draft chapter 5 with new chapters for each topic. Proposals need to consider the retention of trees in accordance with Policy CP20 of the JCS.
217		4.43 Demolition is well considered including the recycling of building materials.	Comment noted.
218		4.46 The future occupants of developments has been very well considered, including their comfort, ease of use of their homes, sustainable transport, etc.	Comment noted.
219		4.49 Climate change adaptation is set out here but at 4.50 there is poor follow through in the Submission Requirements.	Chapter 4 merged with other chapters of the document. The Council considers climate change adaptation is considered appropriately throughout the document.
220		5.11 – 5.17 Site layout, landscaping and urban form is excellent, but there seems to be a missed opportunity to emphasis the protection of existing trees, scrub and other habitat on the site.	It is considered that sufficient wording on this matter is included under the sections addressing layout and green infrastructure.
221		5.18 Building Design. I welcome the requirement for buildings to be easily adapted to future energy efficiency and carbon reduction measures.	Comment noted.
222		5.22 Key Considerations for building design will be a useful tool.	Comment noted.
223		5.22-5.47 This Chapter is excellent and goes into more detail on water conservation such as harvesting rainwater and grey water, and greening for carbon capture and cleaner air.	Comment noted.

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224		5.50 clearly emphasises the importance of trees, so 5.52 “existing trees should be preserved if appropriate” must be tightened up – by dropping “if appropriate” to demonstrate the presumption must be against felling existing trees.	It is considered the wording is proportionate and in accordance with Policy CP20.
225		5.53-5.58 Very good points are made about tree planting - right tree, right place, species to plant, etc., but although green roofs and green walls are suggested as further green infrastructure, they are not listed on your Sustainability Checklist, which leaves this aspect up to the developer.	Now included Sustainability Checklist.
226		5.68-5.79 Future-proofing the District’s green infrastructure is well thought out here, especially with regard to species adaptation in more extreme climatic conditions, but is there not a built environment: green infrastructure ratio that could be incorporated here?	The SPD cannot introduce new policy requirements such as new targets for GI provision.
227		5.78 is the right approach to the consideration of existing trees and plants on the site.	Comment noted.
228		5.85-5.99 This is an exhaustive section on Embodied Carbon and includes demolition and waste, which is excellent.	Comment noted.
229		5.105 Development Location aims to minimise car-use and maximise public transport. This will require other measures from HCC across the country to have any meaning.	Comment noted.
230		6.0 Providing opportunities for the production and storage of renewable energy on a new build site is a surprising and very welcome point, as is allowing for community food growing.	Comment noted.

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231	Headley Parish Council	<p>1) The national planning policy is committed to the UN goals for sustainable development which requires climate change mitigation. It makes clear the need for planning to support renewable low carbon energy and infrastructure and shaping of places to support reducing carbon emission.</p> <p>The NPPF also gets adapting to climate change as a key objective of planning.</p> <p>Correspondence by the government intends to legislate for a 31% CO2 reduction in the DER (dwelling emission rate) compared to the target emission rate for Building Regulations for all new dwellings to come into force in 2022 this year.</p> <p>Furthermore, the government intends to legislate for the Future Homes Standard (FHS) which will require new homes to use 75-80% fewer carbons compared to current Building Regulations Standards and this to come into force in 2025</p>	Comment noted - the SPD reflects this.
232		<p>2) These are laudable ideals and goals, but a government can legislate anything, but have they thought (a), how can this be done practically and (b), how can it be paid for? There will surely be a considerable cost. Just increasing various taxes on all of the ratepayers when many are already financially stretched will not help people who have to pay more, nor will it encourage them.</p> <p>These are key issues for EHDC who will be staffing up to do the work and trying to finance it.</p>	The SPD provides guidance on measures that can be viably delivered through the planning system as part of development proposals.
233		<p>3) Some ideas such as proposing district heating are probably non starters in normal situations, however other situations such as building complexes like large hospitals and universities which have many large buildings close together which make the supply of services easier and cheaper could be appropriate.</p>	Comment noted.
234		<p>4) Highlighting the importance of landscape as an integral part of any infrastructure work is a very good step forward to improving quality of life in residential and commercial areas, and not building in flood risk areas is a part of this forward thinking.</p>	Comment noted.

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235		5) More flexible housing design along with the suggested energy savings should improve housing over the long run, many may have a cost burden to developers that will be passed on to the homeowners, however rating systems need to be overhauled from a system that punishes homeowners who improve their property to a system that actually helps and encourages people to implement the proposals.	Comment noted. It should be noted that the policies in the local Plan are subject to viability testing to ensure the proposals in it can be delivered having regard to gross development value, costs, land value, landowner premium, and developer return.
236		6) Moves to bring sunlight/daylight considerations back officially for consideration at planning and design stages are important, as developers do not always do this.	Comment noted.
237		7) Reduced travel for employment requires more use of online/internet workspaces at home and in some public buildings, more variety in opportunity for local employment is vital to Whitehill/Bordon as at the moment it seems only locals in the building industry are busy locally.	Comment noted.
238		8) There is no reference to increased garage sizing in terms of usable parking areas for new development. EHDC Vehicle Parking Standards 2014 refer to acceptable/minimum parking space sizes of 2.4m x 4.8m but do not mention minimum garage sizes. New sustainable development should require garaging to hold an average width car of 1.85m with additional space to be able to exit the vehicle. Using the current parking space sizes for outdoor locations translates to a garage clearance of 0.17m on each side of the vehicle. This is insufficient space to open a door which is why people only use garages for storage. If EHDC retains its current vehicle parking standards with no clarity on minimum garage sizing, garages should not be used in the calculation of vehicle spaces per property. Therefore, reference to Vehicle Parking Standards within the new proposed SPD is only relevant if the standards for garaging are improved.	The EHDC Vehicle Parking Standards 2018 set out minimum garage space standards.

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239	██████████	At page 5 Para 2.4 it states - As SPD's do not form part of the development plan, they cannot introduce new planning policies into the development plan and should not add unnecessarily to the financial burdens that the Planning System places on development. The new emerging Local Plan will therefore incorporate new policies on climate change and sustainable construction which will then supersede this SPD. If the SPD cannot be used for the purposes of the JCS to 2028 then why are we being consulted now and not as part of the Regulation 19 consultation for the new Local Plan where it is assumed this SPD data will be included?	The SPD provides additional guidance to the adopted Local Plan including the JCS.
240		Page 16 para 4.11 Set out what BREEAM means/is. It is not in the Glossary.	Now inserted.
241		Page 19/20 para 4.24 and 4.25 Uses the word encourage not "must". Will this be sufficiently robust?	chapter 4 has been merged with other chapters of the document, however the wording throughout the document is considered appropriate.
242		General; o A significant number of requirements are linked to BREEAM. How sustainable and/or relevant is this linkage moving forward?	BREEAM remains the leading sustainability assessment method for development projects.
243		I am concerned over the number of additional tasks and requirements, all justifiable, placed on Developers will add significantly to their costs. The impact will be on viability and therefore added downward pressure on numbers of affordability homes to be provided in any development. Additionally the costs have to be passed on to purchasers of the housing thereby adding additional upwards direction in housing cost.	The SPD has been prepared to ensure it is not introducing new policy requirements but also includes best practice and guidance on a range of measures to encourage developers to deliver more sustainable development beyond the minimum policy requirements.
244		I note on page 24 para 4.54 that the data referred to in the above bullet has to be applied at the planning application stage. In order for a Developer to reduce risk there will need to be significantly more pre application business conducted with the Planning Authority. Will there be a staffing implication associated with this?	it is not anticipated the SPD will result in additional pre-application requests - nevertheless the Council is able to accommodate a varied case load of planning applications.

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245		I think this is a very comprehensive document with commendable content. So well done EHDC. My question is are all Planning Authorities doing the same thing and why is this not being standardised across the Nation? The cost of developing and maintaining a document containing all of this data must be significant.	Comment welcomed. All authorities prepare Local Plans and SPDs at different timescales depending on the local context and issues to be addressed.
246	National Highways	We have reviewed this consultations and associated documents and have 'No Comments'. However, we welcome that this draft document aims to support development in order for it to be accountable to the challenges of mitigation and adapting to climate change and to address sustainability issues. We specifically welcome that issues in relation to transport are taken into consideration through recommendation of 'active travel', such as walking, cycling and dedication of pedestrian and cycle routes to provide through routes and connections with wider network as well as means of reducing the need for travel through the use of technology (i.e. greater broadband connections).	Comment noted.
247	Medstead Parish Council	The respondent has included where wording should be amended to states 'must' and 'should' throughout the document.	The submitted wording has been considered. Wording in the SPD has been reviewed to ensure the measures set out in the document relate to policy requirements or they are optional considerations the Council wish to see brought forward by applicants.
248	Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft SPD or the revised SCI	Comment noted.

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249	Natural England	<p>Suggest 4 specific actions to include in the Plan/SPD:</p> <ol style="list-style-type: none"> 1. Set an ambitious climate-specific targets within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050; 2. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open priority habitats must be avoided. 3. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment. 4. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities. <p>Advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife.</p> <p>The SPD should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.</p>	<p>The SPD cannot set climate specific targets that would be the equivalent of additional policy requirements. The Council will however be reviewing climate change policies and targets in the preparation of the new Local Plan.</p> <p>It is considered the SPD now includes sufficient wording regarding GI and specifically tree planting. Reference to the Council's GI strategy which identifies opportunities for enhancing the existing GI network and delivering new GI has now been added.</p> <p>The GI Strategy and Local Plan policies map identify the range of habitats and wildlife sites required protection in accordance with Policy CP21 Biodiversity of the JCS.</p>

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250		Natural England has published a range of resources to help with the recommended actions.	Reference has been made to the Climate Change Adaptation Manual.
251	██████████	Supports response submitted by Gerri Jacobs.	Noted.