



Sustainable Construction Supplementary Planning Document Consultation Statement

July 2020

- I.1. The Sustainable Construction Supplementary Planning Document (SPD) provides further guidance to support the implementation of Local Plan policies, in particular Policy SD2: Ecosystem Services; Policy SD3: Major Development; and Policy SD48: Climate Change and Sustainable Use of Resources. Once adopted, the SPD will be a material consideration in the determination of relevant planning applications.
- I.2. This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country (Local Development) (England) Regulations 2004 which states:

“Before a local planning authority adopt a supplementary planning document it must—

 - (a) prepare a statement setting out—*
 - (i) the persons the local planning authority consulted when preparing the supplementary planning document;*
 - (ii) a summary of the main issues raised by those persons; and*
 - (iii) how those issues have been addressed in the supplementary planning document; and*
 - (b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of—*
 - (i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and*
 - (ii) the address to which they must be sent.”*
- I.3. This statement sets out details of the consultation that has taken place to date which has informed and refined the SPD. It sets out details of how, when and with whom the initial consultations with interested parties and organisations took place and how this has informed the SPD.
- I.4. Following the preparation of the draft SPD, the Authority resolved to undertake a six week consultation on the Sustainable Construction SPD between 11th February 2020 and 24th March 2020. As part of the consultation, the Authority:
 - Published the draft Sustainable Construction SPD on the SDNPA website;
 - Made the draft SPD available for inspection at the South Downs Centre during opening hours;
 - Sent emails and letters to persons and organisations on the SDNPA Local Plan mailing list inviting them to examine the consultation documents and make any representations on them during the consultation period;
 - Sent emails to consultation bodies identified below, which the Authority considers to be affected by the SPD;
 - Released details of the consultation to the local press via a press release;
- I.5. The Authority considered it appropriate to consult the following consultation bodies on the draft Sustainable Construction SPD:
 - Homes and Communities Agency
 - Relevant district and county councils
 - Adur District Council
 - Arun District Council
 - Brighton & Hove City Council
 - Chichester District Council
 - East Hampshire District Council
 - East Sussex County Council
 - Hampshire County Council

- Horsham District Council
- Lewes & Eastbourne District Councils
- Mid Sussex District Council
- Waverley District Council
- Wealden District Council
- West Sussex County Council
- Winchester City Council
- Worthing Borough Council
- Parish Councils within the National Park
- CPRE Hampshire
- Action in Rural Sussex
- Local developers and Registered Providers
- Estates within the National Park that have developed Whole Estate Plans

In total this consisted of 1029 stakeholders, including individuals, statutory bodies, developers, 176 agents and other organisations.

- I.6. Consultation responses were received from 25 individuals and organisations. The comments received are summarised in **Appendix I**. Officer comments relating to the responses received and how the SPD has been amended in response to these comments is also set out in Appendix I.
- I.7. Following the amendment of the Sustainable Construction SPD, incorporating the changes highlighted in Appendix I, the revised draft and the Consultation Statement were published for a further period of public consultation between May 19th and June 30th 2020. Further comments received during this consultation have been added to **Appendix I** in a second table.

Appendix I**Draft Sustainable Construction SPD – Summary of comments received and officer comments**

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Alan Redpath	I thought it was an excellent document, forward looking and wholly sensible - providing a good balance of the issues/goals and proposed policies.	Grateful for the support	None required
Alan Redpath	Sustainable transport should be a key policy for 10 plus house developments	Sustainable Transport opportunities are always considered in development schemes of this size and are subject to the requirements in Local Plan Policy SD19 (amongst others). This includes making connections to existing non-motorised vehicle networks, such as PROWs and cycle ways. All new homes will require EV charge points.	None required
Arundel Town Council	No Comments	Noted	None required
Bepton Parish Council (John Beckett Councillor for Planning)	Much of the content of the SPD is excellent but on a number of proposed targets for Greenhouse Gas Emissions it lacks the ambition urgently required to control climate change. Passive house should be 50% of units not just 10%	It is considered that the Authority has gone as far as it can, given the policies in the local plan. Supplementary Planning Documents cannot make new policy.	None required

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Bepton Parish Council	Water Use.....Rain Water Harvesting and Grey Water Recycling should be mandated where feasible rather than "encouraged".	The Authority cannot be prescriptive about how the standard is achieved.	None required
Bramshott and Liphook Parish Council	Supports the draft Sustainable Construction Supplementary Planning Document and finds it to be aspirational.	Grateful for the support	None required
Brighton and Hove City Council	General point is that certain paragraphs read as policy rather than guidance	The SPD is intended to provide further guidance to aid and support the implementation of relevant South Downs Local Plan Policies which seek to address climate change and the sustainable use of resources.	None required
Brighton and Hove City Council	General point is that specific percentage CO2 reduction, green roof and passive house targets are not reflected in Local Plan policy directly.	Although not quantified, Policy SD48.3 clearly requires all development to 'demonstrate proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.'	None required

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Brighton and Hove City Council	The guidance specifies that developers have to reach a specific target for the energy component of BREEAM. BHCC have dropped a similar requirement, as developers have argued that you can't break down BREEAM into its various components. BHCC now just require that the overall target of 'excellent' is reached.	Point noted but again some prescriptive minimum requirements are thought necessary to proportionately interpret Local Plan Policy SD48.3 as without them it would be possible for major non-residential development to score very poorly in certain sustainable construction issues such as waste and sustainable pollution while still achieving BREEAM excellent overall.	None required at present although we will review this aspect when we review the SPD in the future, following experience of its application in practice.
Cheriton Parish Council	Document should exclude use of log burners	Excluding log burners from new homes would be, in the Authority's view, disproportionate. However all new biomass boilers proposed as part of the energy calculation for development would need to meet the 2022 EU stringent emission standards, i.e. be 'EcoDesign ready'. This is explained in para 2.46 of document.	None required
Cheriton Parish Council	Where underfloor heating is installed it must be accompanied by the use of individual digital room thermostats	This is good guidance advice although the Authority would not be able to insist on it.	New text added to the SPD: 2.41 <i>Heat pumps work well with underfloor heating as this requires</i>

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	capable of operation from a single or central software application on a smart telephone or laptop machine.		<i>lower temperatures than traditional wet radiators. Where underfloor heating is installed it should be accompanied by the use of individual room digital and programmable thermostats, to minimise wasted heat in unused rooms.</i>
Cheriton Parish Council	A presumption in favour of solar panels and the use of ground source heat pumps as the means of providing heat and light to be included in all development planning applications, with backup systems provided by the traditional gas (incl. LPG) and electricity suppliers. The need for exceptions to be evidenced.	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (maximum reduction in CO2 emissions) rather than requiring specific technologies.	None required
Cheriton Parish Council	Recommend use of low emissivity glass, energy efficient light bulbs and Cat 5 ethernet cabling and the installation of sockets including USB, which will facilitate the 'smart' control of digital and electronic devices to reduce heat loss, electricity use and encourage home working respectively	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (reduction in CO2 emissions) rather than requiring specific technologies. The energy properties of building elements (such as windows) and the performance of lighting fixtures will all contribute to a CO2 calculation	None required

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		and the performance target set in this document. A reference to high speed internet connection hardware for new homes will be considered in the forthcoming SDNPA Design Guide SPD.	
Cheriton Parish Council	No mdf in the use of skirtings or architrave should be mentioned.	The Authority believe this is too prescriptive and it would be impracticable to enforce.	None required
Cheriton Parish Council	Apply 'grey water', rain water harvesting and boiling water taps in all development.	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (mains water consumption target) rather than requiring specific technologies.	None required
Cheriton Parish Council	EV charge points should be provided at a greater rate than only 1 in 5 spaces.	Note this rate is only for non-residential developments and all new dwellings (where the majority of charging is expected to occur) are expected to have a charge point. It is considered disproportionate at this stage to insist on more than 1 in 5 car parking spaces for non-residential development to receive charge points	None required

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Cheriton Parish Council	A much greater proportion than 10% of dwellings should be passive house standard	Although it is agreed that passive house standards will be popular with many occupants it is considered to be appropriate and proportionate to start with a 10% passive house figure for larger housing developments given that there is no specific figure in the Local Plan requiring passive house standards and as the passive house standard is not yet ubiquitous	None required
Christopher Hicks	Comments on some of the text in Local Plan policies SD2, SD3, SD22, SD48.	The policies are from the Local Plan adopted in July 2019 and this document is not able or seeking to amend them but rather they are quoted in the document because the document is interpreting those policies and providing more detailed guidance.	None required
Chris Jeffries	EV charge points should be provided at a greater rate than only 1 in 5 spaces.	Note this rate is only for non-residential developments and all new dwellings are expected to have a charge point. At present it is considered to be too onerous to expect more than 1 in 5 spaces in	None required

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		non-residential development car parks to have charge points although the infrastructure still allows this rate to be increased as demand increases.	
Chris Jeffries	More reservoirs should be planned	This is beyond the scope of the SPD.	None required
Chris Sprules	Overall document looking really good	Grateful for support	None required
Chris Sprules	Sustainable transport: <ul style="list-style-type: none"> • Cycles or NMUs must be accessible to encourage use • Electric Bikes should have access to charging points 	Cycle and/or mobility scooter storage will be considered in forthcoming Parking SPD and/or Design SPD. The necessity of including separate charging for electric bikes in residential development is debatable as, compared with electric cars, bikes are more manoeuvrable and should be able to be charged from the house or garage.	None required
Chris Sprules	Grey water should be mandatory	The Authority cannot be that prescriptive and is limited by Government to a 110 litre/person/day standard for all development except for 'Major Development' (as defined by local plan policy SD3) where a lower	None required

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		figure of 90 litres is considered appropriate. Both of these standards can be met without the use of grey water.	
Cove Construction	<p>General concern that the following requirements in the draft SPD go too far and represent attempts to create new policy:</p> <ul style="list-style-type: none"> • 20% CO2 reduction via low/zero carbon on-site energy. • 10% passive house homes for larger developments. • EV charge points for all new dwellings • Domestic and construction waste requirements • 10% green roofs for larger developments 	<p>The Authority acknowledges that the measures listed were not explicitly quantified in the local plan but it takes the view that the SPD provides further appropriate guidance to help support the implementation of these local plan policies which seek to address climate change and the sustainable use of resources.. We would also note;</p> <ul style="list-style-type: none"> • The 20% figure is eminently achievable through technologies such as photovoltaics (PV, air source heat pumps (ASHPs) or biomass heating or a combination. • 10% Passive house homes require a modest extra build cost but can be sold at a 	<p>A paragraph in the Introduction chapter (para 1.11) has spelt out that: <i>'...although the measures will be expected in the vast majority of cases, where there are genuine and evidenced technical reasons or significant viability consequences, the Authority will consider these matters on a case by case basis and may waive certain requirements.'</i></p>

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		<p>premium and provide very significant fuel bill savings aiding the marketability of these dwellings. Passive house represents the likely direction of travel for all new homes in the near future.</p> <ul style="list-style-type: none"> • EV charge points for all new homes should nearly always be feasible on plot or in shared car parks. • Domestic waste measures (kitchen bins and compost bins) are financially insignificant. • The Authority's construction waste requirements only require what should be good practice to reduce waste to landfill. • The Green roof requirement set out in the SPD helps deliver many local plan policies including Ecosystem 	

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		services, green infrastructure, SuDS, adaptation to climate change as well as biodiversity net gain requirement. 10% of roofs being green roofs on larger developments is deemed proportionate and appropriate.	
CPRE Hampshire	This SPD implements SDNP Local Plan Policies SD2 (Ecosystem Services) and SD48 (Climate Change and Sustainable Use of Resources) which have already received the support of CPRE Hampshire within the Local Plan consultations. Accordingly, this SPD has our full support.	Grateful for support	None required
CPRE Hampshire	Believes that whole developments should be passive house standard rather than only 10% and will be very popular with occupants.	Although it is agreed that passive house standards will be popular with many occupants it is thought proportionate to start with a 10% figure for larger housing developments (10 and above homes). There is likely to be a modest extra	None required

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		build cost at least in the short term until passive house standards become more widespread, which is likely.	
East Hampshire District Council	Have no comments to make on the proposed SPD.	Noted	None required
Eric Croft	<ul style="list-style-type: none"> • Too unambitious in mitigating climate change • Passive house should be a general rule, not just 10%. • Plastic windows, doors and other unnecessary details, such as barge boards should be avoided 	The Authority believes that the SPD is a proportionate interpretation of the existing local plan policies. The document cannot make new policy. Although plastic windows and doors etc. will be discouraged it is thought that an outright ban is too prescriptive.	None required
Ferring Parish Council	Interested to read the content of the consultation and will continue to support the work of South Downs National Park Authority.	Grateful for the support	None required
Fittleworth Parish Council	Members welcomed the aspirations of the guidance and agree with its aims.	Grateful for the support	None required
Fittleworth Parish Council	Would prefer the document to also address how existing housing stock could be retro-fitted to be more sustainable.	The document can only interpret the policies in the SDNP Local Plan. The planning system has significant influence over new development but	New text added to the SPD: 1.17 <i>The Authority strongly supports the need to retrofit existing building stock to make it more energy</i>

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		has little or no control over existing buildings and none over improving efficiency or encouraging renewables in existing buildings which are remaining in the same use class.	<i>and water efficient. However, unless there is a major refurbishment or an extension to a non-residential property is proposed, the planning authority has very limited influence over existing building stock and consequently this document does not address this specific issue.</i>
Fittleworth Parish Council	Would like more practical guidance on what renewable energy measures work in what circumstances	<p>The document does set out certain circumstances that favour specific technologies and this will be augmented with the proposed text in the right hand column.</p> <p>Detailed locally specific guidance is not possible as each location and each proposal will have its own sensitivities and considerations.</p>	<p>New text added to the SPD:</p> <p>2.35 <i>Where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, PV may be much less feasible.</i></p> <p>2.39 <i>As with PV, where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, solar water heating may be much less feasible.</i></p> <p>2.48 <i>For the reasons above, biomass heating systems are less appropriate where space on plot and access to plot is limited or constrained but</i></p>

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			<i>conversely may be very appropriate on easily accessible and larger plots and in rural off-gas grid areas, subject to visual impact considerations.</i>
Forestry Commission	Supports the following in the draft document: <ul style="list-style-type: none"> • Retention and expansion (where possible) of existing trees and woodlands • Use of trees and woodlands to reduce 'heat island' effects within new developments • Use of trees to create shade • Encouragement to use FSC and Grown in Britain timber in construction projects 	Grateful for the support	None required
Forestry Commission	Also supports investigation into inclusion of 'honorary natives' into any permitted species list which may be drafted, and also consider suitable exotics which may	Noted, although these details will be considered in the forthcoming SDNPA Tree SPD	None required

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	both benefit wildlife and provide resilience against a changing climate.		
Forestry Commission	Provides standard advice on the importance and irreplaceable nature of ancient woodland	Noted, although this document will have no direct effect on ancient woodland	None required
Hampshire Constabulary Designing Out Crime Officer	Paragraph 2.56 of the SPD advises a suitable parking space “would include on-plot spaces, on-street spaces with sufficient space to allow good pedestrian access around a charge point and spaces within nearby car parking courts.” On street spaces problematic as will attract crime when charging.	Vast majority of new development car charging spaces will either be on plot or in dedicated and allocated car parking spaces. There may be rare situations where on-street spaces would be the only option.	The document has been amended to make it clear that on-street spaces should be the least favoured option after on-plot and allocated car parking spaces in a car park: 2.60 A ‘suitable car parking space’ would include on-plot spaces, spaces within nearby car parking courts, and then, only when the previous two locations prove unfeasible, on-street spaces with sufficient space to allow good pedestrian access around a charge point.
Luken Beck	Considers that the document should incorporate additional commentary on where exemptions can be applied to	Noted. Although all SPD guidance measures are inherently subject to technical feasibility and viability the	A paragraph in the Introduction chapter (para 1.11) has spelt out that: ‘...although the measures will be expected in the vast majority of

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	developments that have their viability threatened by the standards set out within the document.	Authority is happy to spell this out at the front of the document	<i>cases, where there are genuine and evidenced technical reasons or significant viability consequences, the Authority will consider these matters on a case by case basis and may waive certain requirements.'</i>
Midhurst Society	We have considered your draft document and generally welcome the proposed procedures and support and look forward to its adoption and implementation.	Grateful for the support	None required
Cllr Mike Croker of Bramber Parish Council and Horsham District Council	Given the 'Climate Emergency' all development should be passive house standard	The document can only interpret existing national or local policy and cannot create its own policy. The Government has not provided a clear steer on energy standards for new development (although minimum national standards are set by building regulations) and the SDNP Local Plan policies are restricted by Government as far as energy efficiency is concerned.	None required
Cllr Mike Croker	Section 2 Energy Efficiency: fully support the 'fabric first' approach and welcome	Agreed and grateful for support	None required

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	the recognition that use of a mechanical ventilation and heat recovery system is an essential element of a new dwelling fit for the 21st century.		
Cllr Mike Croker	Section 2 On-Site Low Carbon Energy: broadly agree with the approach in this section, although I have some concern over the use of biomass heating in all but large commercial installations, due to ongoing maintenance requirement to ensure that particulate emissions are kept within strict limits.	All new biomass heating will need to be 'Ecodesign ready' meeting the 2022 EU standard which imposes much stricter controls on all pollutants including particulates. This is explained in para 2.46 of document	None required
Cllr Mike Croker	Section 2 Water Consumption: would prefer rainwater harvesting storage as mandatory	Government restricts water consumption targets LPAs can impose and SDNPA policy SD48 requirements are the most stringent standard allowed. We cannot be prescriptive about rainwater harvesting.	None required
Cllr Mike Croker	Section 2 Adaption to Climate Change: fully support the 'landscape led approach' of the SDLP	Grateful for the support	None required
Cllr Mike Croker	Section 3 Zero Carbon: fully support 3.10	Grateful for the support	None required

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	and Section 3 Health and Wellbeing: fully support 3.26.		
Cllr Mike Croker	Section 3 Sustainable Transport: 3.15 should include a requirement for charging of electrically assisted pedal cycles, both in the storage locations of individual dwellings and for visitor parking. It should also require compliance with the relevant county cycle infrastructure design guide e.g. West Sussex Cycling Design Guide.	Cycle and/or mobility scooter storage will be considered in forthcoming Parking SPD and/or Design SPD.	None required
Paddy Cox	Generally applauds steps being proposed and has commented where SPD can be strengthened or clarified	Grateful for the support	None required
Paddy Cox	Wishes to promote behaviour change to promote energy conservation	Although acknowledge important role of behaviour, this is beyond the scope of the planning system alone.	None required
Paddy Cox	Would like more emphasis on embodied energy of construction	Although acknowledge importance of embodied energy this is very difficult for the Authority to measure and it is felt it would be disproportionate to be prescriptive about certain materials. The document does encourage re-use and use of recycle materials and does encourage the	None required

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		use of alternatives to plastic windows, doors and other common building elements, partly because of the high embodied energy of plastic.	
Paddy Cox	Would like greater stress on local materials	Agreed.	Text in 2.86 includes extra paragraph encouraging applicants to: <ul style="list-style-type: none"> • <i>use locally-sourced materials where possible due to the need to reduce carbon miles inherent in transporting materials from afar.</i>
Paddy Cox	Would like SPD to encourage use of local timber fuel <20% moisture content	The standard of wood that can be used is already being tackled by Government. Agreed locally-sourced materials should be encouraged	See proposed extra paragraph in 2.86 in row above this one.
Paddy Cox	The SPD dismisses on-shore wind energy out of hand, on the grounds of visual amenity which is too categorical, given the importance of maximising green energy.	The document says that wind is likely to be unacceptable for visual reasons in most cases, so this has not been completely dismissed but will be subject to sensitivity of visual impacts.	None required
Paddy Cox	Questions the efficacy of promoting EVs	Research has shown that carbon impact of EVs would be better than petrol/diesel even from a fully fossil-	None required

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		fuel powered National Grid. In fact UK power is fuelled by approximately 50% low/zero carbon energy and rising, so EVs are a much more sustainable way of transporting people than the combustion engine, even taking into account resources needed for battery production.	
Paddy Cox	Notes requirement to use 'Grown in Britain' timber or FSC but would prefer greater emphasis on smaller suppliers	The Authority is keen to support the Grown in Britain (G in B) initiative, which at least reduces UK dependence on imports and the carbon miles associated with that. The Point that smaller companies are less likely to afford G in B certification is noted, although the Authority cannot recommend specific suppliers.	Text in 2.86 now includes an extra paragraph encouraging applicants to: <ul style="list-style-type: none"> <i>use timber from a local source in lieu of Grown in Britain or FSC certified if provenance of this timber can be assured through written documentation.</i>
Selborne Parish Council	SPC fully supports the Sustainable Construction SPD	Grateful for the support	None required
Selborne Parish Council	SPC is concerned that only 10% of larger residential developments are to be Passive Design	Although it is agreed that passive house standards will be popular with many occupants it is thought proportionate to start with a 10%	None required

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		figure for larger housing developments (10 and above homes). There is likely to be a modest extra build cost at least in the short term until passive house standards become more widespread, which is likely.	
Southern Water	Southern Water supports the Authority's requirement for all new dwellings to meet the higher water efficiency standards of 110 l/p/d and 90 l/p/d for major development within the SDNP (p32). Southern Water also supports the requirement for non-residential development to meet the minimum standards for BREEAM 'Excellent' within the water category, since a comprehensive approach to water efficiency standards across all types of new development should be adopted in order to help achieve meaningful savings.	Grateful for the support	None required
Storrington & Sullington Parish Council	Detailed comments, including: a) Within this document, 'carbon neutral' is taken to mean operationally neutral, not whole life.	a) Yes b) Correct as we are only referencing the CO2 emissions regulated by building regulations.	None required

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	<ul style="list-style-type: none"> b) EV charging of EV not included in energy consumption target. c) Why isn't the failure to recycle plastics tackled? d) Document should take into account the extra maintenance required by timber windows over plastic and aluminium. e) Document does not address how solar panels etc. are to be recycled at end of life. 	<ul style="list-style-type: none"> This excludes all electrical appliances. c) Not within the scope of this document to solve this (difficult) problem. d) Properly treated hardwood should not need more maintenance. Even if painting and occasional repairs are taken into account, timber still will be a more sustainable material with a longer lifespan than plastic. e) True although as it happens the components of PV panels are highly recyclable (mostly glass, aluminium and silicon with a small amount of plastic). For the PV installed now this is a problem for 25-30 years from now, which this document cannot directly address. 	

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Storrington & Sullington Parish Council	Promoting airtightness is problematic as living in an airtight environment is not healthy.	Airtightness is not the same as ventilation. E.g. passive houses are extremely airtight but have good standards of ventilation with fresh air warmed with expelled waste air in winter through mechanical means. This ventilation standard is controlled which is not the case for the majority of new homes.	New text (in italics) added to paragraph 2.10: When airtightness is at a good level (3 m ³ /m ² /hr or below) some further measures to ensure good ventilation in the home are usually necessary <i>to ensure that the quality of internal air is acceptable to human health.</i>
Storrington & Sullington Parish Council	Carbon cost of mechanical ventilation and heat recovery is not assessed.	Although not assessed, both measures are carbon positive as energy saved by good airtightness will more than make up for small carbon cost of mechanical ventilation and heat recovery is free energy from waste heat.	New text added to paragraph 2.10: <i>Although running a MVHR system uses some extra electricity, the net carbon saving (of pre-heating fresh air entering the building in winter) more than outweighs this.</i>
Waverley Borough Council	No comments	Noted	None required
The Wiggonholt Association	Page 6 Table: SD48.3 All categories: for “greener materials” substitute “secondary, recycled, and substituted materials as well as greener materials”. A glossary definition should be added for “greener materials”.	This is a summary table and so ‘greener materials’ is deemed an acceptable catch all term for all sustainable materials.	New text added in Glossary: ‘GREENER MATERIALS’ <i>This is a catch all term used in the summary table (Table 1) to describe materials that are re-used; recycled; have lower embodied carbon than</i>

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			<i>standard products; are sourced locally; include timber from locally certified and well-managed sources; and where possible does not include plastic building elements such as windows, doors, barge boards etc.</i>
The Wiggonholt Association	Page 22: We note the Table at 2.76: The use of mobile crushing plant on larger building sites would ensure that demolition waste was accurately gauged and deployed. This is less likely to lead to wasted material within the SDNP, especially as there are not enough dedicated recycling sites in West Sussex. Contractors should be encouraged to exceed the volume and tonnage percentages. Under Volume and Tonnage of the table please substitute “Minimum Volume” and “Minimum Tonnage” for the categories stated. After the words “Site Waste Management Plan” add “which may include mobile recycling plant”.	Noted	In the table in para 2.80 (formerly 2.76) the words “Minimum Volume” and “Minimum Tonnage” for the categories stated have been used. After the words “Site Waste Management Plan” has been added “(which may include mobile recycling plant)”.

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The Wiggonholt Association	Page 23: 2.83 Substitute these words: “use reclaimed, recycled and substituted materials in priority to primary aggregate. Use crushed bricks or concrete for hard core”. Small developments should be included in these requirements. There is no rationale for singling them out from larger developments.	Noted although the Authority believes that it would be disproportionate to require the smallest developments to meet these requirements but that it should nevertheless be encouraged.	Insert the term ‘ <i>substituted materials</i> ’ in para 2.86 (formerly 2.83)
The Wiggonholt Association	Page 30: para 3.13 and chart: the same comments apply as in para 2.76 (and chart)	noted	Substitute “ <i>Minimum Volume</i> ” and “ <i>Minimum Tonnage</i> ” for the categories stated in para 3.13.
The Wiggonholt Association	Page 31: 3.17 (Sustainable Materials) The Sustainable Materials report should include an account of alternative, recycled and substituted materials used on site.	noted	Text will be amended in para 3.17 to include: <i>a sustainable materials report which should include an account of alternative, recycled and substituted materials used on site</i>
The Wiggonholt Association	In all Appendices: Under category “Materials”: add to the definition, “substituted” before “re-used, recycled or other green materials”	noted	In all Appendices: Under category “Materials”: the term “substituted” has been added before “re-used, recycled or other green materials”

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Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
The Wiggonholt Association	Appendix 2: Transfer category “Materials” to the blue band of requirement, as above.	For reasons of proportionality the Authority believes it more appropriate to encourage rather than require these measures for single dwellings.	None required
The Wiggonholt Association	All climate change policies of public bodies are now modified in the light of the recent decision (27 February 2020 on Heathrow) in the Court of Appeal which requires those bodies to take into account the Government’s policy commitments on climate change under the 2015 Paris Agreement (adopted November 2016). So sustainable construction targets should be much more ambitious	The SDNP local plan policies already take account of the Government’s policy commitments in this area and contribute to their implementation within the local plan period (which runs to 2033). A review of the local plan will take place within 5 years from adoption when these policies may be revised.	None required

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Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Bohunt Manor Community Action Group	Support the document	noted	None required
CPRE	Welcome document but ideally would like it to go further	noted	None required
CPRE	Would like more precise requirements for 3.24 Health and Wellbeing to clarify expectations	Noted, although as this applies to Major Development (which is relatively rare in the National Park) and as the metrics may vary depending on the nature of the development, the SDNPA believes that it is appropriate to leave the discussion about exactly how to measure daylight/ventilation/thermal comfort/overheating risk/acoustics to negotiations on a case by case basis considering the applicable context.	None required
Forestry Commision	No further comments	noted	None required
Greatham Parish Council	Commends the document	noted	None required
Greatham Parish Council	Should be more ambitious with the amount of EV charging required in all new development	SDNPA understands this aspiration but considers there is a need to be proportionate. This will be reviewed	None required

		in future revisions of policy and guidance.	
Greatham Parish Council	19% reduction in CO2 emissions refers to the 2013 Building Regulations baseline. But this should be 19% reduction even when building regulations get updated.	Government restricts Local Planning Authority's freedom to set targets beyond this specific one in relation to energy efficiency.	None required
Greatham Parish Council	Specific requirements for heating controls in rooms and waste recovery suggested.	SDNPA believes this to be too prescriptive	None required
Greatham Parish Council	Omit reference to technical, physical design reasons (in para 2.24) for Authority to consider being pragmatic in application of 20% reduction target	The Authority will have to be pragmatic when there are genuine physical constraints making implementation of targets difficult or impossible and so it is appropriate to say so.	None required
Greatham Parish Council	In para 2.29 the illustration of power typically generated from a certain size of PV panel may be an underestimate as the technology and efficiency is advancing quite rapidly.	noted	Text amended in para 2.29 to add: <i>This may be a conservative estimate of the power generated per square metre and the efficiency of PV is improving every year.</i>
Greatham Parish Council	All multi-residential development residents should have one EV charge point	Multi-residential development includes older people's accommodation and student flats etc. (not multiple home development in the more normal sense). It is not thought proportionate to provide an EV charge point for every resident at this stage for such development.	None required
Greatham Parish Council	Rainwater harvesting should be required	SDNPA considers this to be too prescriptive	None required

Greatham Parish Council	Para 2.94 add rain water harvesting to list of measures to reduce storm water runoff.	noted	Text amended in para 2.94
Greatham Parish Council	Para 3.15 requires 1 in 5 EV charge points per car space for non-residential development which conflicts with table 1 (1 in 10). Table 1 should be amended	Table 1 only relates to standard development in the National Park whereas Chapter 3 relates to 'Major Development' (as defined by policy SD3) and so there is no contradiction with the different standards.	None required
Greatham Parish Council	Suggests cycle storage requirements	This will be covered by the forthcoming Parking SPD	None required
Hampshire Constabulary	Concerned that EV parking still allowed on the highway in para 2.60	The draft SPD makes it clear that the preference is for on plot and communal car park solutions and that on street car parking for EV charge points would be a last resort and only when there is sufficient space.	None required
Lewes District Council	Broadly supportive with some detailed areas of concern	noted	None required
Lewes District Council	Document does not go far enough in requiring CO2 emissions	SDNPA believes it is setting targets which are as ambitious as possible within the limits of the adopted local plan policies.	None required
Lewes District Council	Prescriptive standards like Passive house should be avoided	Passive house has been used as an appropriate target (as a proportion of major development) because it is a nationally recognised standard, it is the apparent direction of travel for new homes in the near future and it is independently assessed.	None required

Lewes District Council	If passive house to be used then it should be for all development	A 10% figure for major residential development is thought proportionate, although this could be reviewed in future revisions of policy or guidance.	None required
Lewes District Council	EV charging should also consider vehicle to grid solutions to balance out the local energy grid	The scale of proposed development in the National Park compared with existing development is not significant enough to consider this likely to be a problem	None required
Lewes District Council	The table on page 22 shows Lewes District Council has alternate weekly collections – this is incorrect as our waste collection is weekly.	noted	Text amended
Lewes District Council	Should go further with water consumption targets for all development	SDNPA sympathise with this aspiration but central Government has restricted Local Planning Authority freedom in this area. The strictest standard Government allows has been adopted and only for the exceptional 'Major Development' schemes (as defined by policy SD3) can the Authority justify pushing for a stricter target still.	None required
Lewes District Council	Support Grown In Britain' promotion	noted	None required
Lewes District Council	For adaption to climate change should be promoting spaces to grow food.	noted	Text amended in para 3.25: <i>Opportunities for on-site or close local food growing opportunities should be provided.</i>

Selborne Parish Council	Support the document	noted	None required
Southern Water	No further comments following previous comments on earlier draft	noted	None required
Surrey County Council	No comments	noted	None required
Wealden District Council	No significant comments but Table at paragraph 2.78 should be updated as garden waste collection service in Wealden District Council area is now every 2 weeks	noted	Text amended in para 2.78
Winchester City Council	Table at paragraph 2.78 should be updated as WCC now offers a monthly glass collection service in addition to the other measures mentioned in the table.	noted	Text amended in para 2.78
Winchester City Council	Consideration could be given to enhancing the standards for EV charging for the 'minor non-residential and multi-residential' category to be consistent to those for the 'major non-residential and multi-residential' category.	The SDNPA does not believe that requiring small non-residential development to provide EV charging for staff or visitors would be proportionate at this time but this will be reviewed for future updates of the document	None required
Wiggonholt Association	Pleased that many of our earlier comments have been applied to current draft but would like requirements for use of greener materials to also apply to single dwellings	SDNPA believe that having the same requirements for single dwellings on this matter is disproportionate.	None required