

**CLIMATE CHANGE SPD CONSULTATION SUMMARY & PROPOSED RESPONSES**

**Respondents**

<b>Respondent and reference number</b>	<b>Respondent and reference number</b>
01 VOID	23 VOID
02 VOID	24 M Smith
03 VOID	25 T Phillips
04 VOID	26 A Lawton
05 A Ford	27 Bargate Homes
06 VOID	28 Barratt David Wilson Homes
07 Wings Wildlife Heritage	29 Historic England
08 P Thomas	30 Stoford Developments
09 R Palmer	31 Persimmon Homes
10 Chapman Lilley Planning	32 McCarthy Stone
11 S Tonkin	33 New Milton Town Council
12 B Lord	34 New Forest Friends of the Earth
13 A Witt	35 Ringwood Town Council
14 A Elliott	36 VOID duplicates 20 Bloor Homes (Southern)
15 L Tonkin	37 Hordle Parish Council
16 VOID	38 National Highways
17 Southern Water	39 Fiddlesticks Farm
18 D Orme	40 Coal Authority
19 New Forest East Constituency Labour Party	41 L Everitt
20 Bloor Homes (Southern)	42 P Stickley
21 R Kent	43 Natural England
22 M Humber	44 Cranborne Chase AONB

VOID responses were either online responses started but left incomplete, duplicated responses or responses invalidated as they lacked a respondent name or address.

**Summary of responses**

**CC SPD Purpose and objectives**  
 Q1. What are your views on the main aims of the CC SPD as summarised in paragraph 2-3? (Section A provides general context, including on the role of the planning system).

Views on the main objectives ranged from ‘insufficiently ambitious’ (most individual respondents) to ‘laudable but unduly onerous’, including viability implications (some development interests).  
 Amongst some development interests a common theme was that carbon, energy efficiency and other climate related matters should be left to National Building Regulations and any forthcoming national planning standards, rather than creating more burdens at planning application stage, especially as their planned evolution could render much of the draft SPD out-of-date. Encouragingly some developer responses were more supportive and described positive and forward-looking approaches they were already working on or delivering, whilst noting the need for some flexibility – which the draft SPD ‘best endeavours’ approach enables.  
 NE commented that the SPD could be much stronger in recognising and requiring the role of the natural environment in tackling climate change

From	Representations	NFDC Response
05 A Ford	Lacks protection for green belt land and wildflower meadows or habitats from development.	These matters are covered by existing national and local plan policies and are outside of the scope of the SPD
09 R Palmer	"Zero carbon ready" cannot be used as a get out clause to not undertake necessary steps to decarbonise new developments. There should be a target date after which all new developments should be zero carbon to give clear direction and an aim for the council.	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance or the adopted local plan policy to require zero carbon development.
10 Chapman Lilley Planning	The aims and objectives of the draft SPD are laudable but onerous and place yet more burdens upon applicants - at a time when financial constraints have consistently increased across the sector. The requirements, both in terms of resource and the financial implications of these extra reports (someone's got to pay for their completion / production!). Additional work will be required by the planning consultant / architect to complete a Climate Change Statement, but many schemes will not be in a position to give precise answers to the questions sought in the Statement.	The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets.

From	Representations	NFDC Response
	<p>The NPPF Para 152 talks about 'encourage and support' not regulate and obfuscate or add additional burdens to business.</p> <p>So, before adoption, the LPA must ask itself the following questions and be satisfied with their own answers;</p> <ol style="list-style-type: none"> <li>1. Para 4 page 6 - As explained, much of the information requested may not be known at the early stages of application. The design and build stage often comes after the cost and delays in getting a planning permission (if forthcoming) in the first place.</li> <li>2. Any such information submitted may need to change during the processing of the application when the LPA requires design amendments - so floor areas / volumes / detailed design will change - will the CCS need to be updated?</li> <li>3. As with any planning policy -the requirement's must (amongst others) be clear, precise and enforceable. Who in the LPA will check the specifications on the drawings have actually been implemented? If the answer to this is 'no-one' or 'no capacity' or 'planners do not have the necessary skills to check' then the requirements are somewhat meaningless.</li> <li>4. As with all design standards and Building Regulation requirements, these constantly change. It is highly likely that even during the processing of the application, the requirements will change.</li> <li>5. The LPA must make it clear as to the weighting placed upon this issue as a material planning consideration - i.e. are you going to seriously approve a planning application that in your opinion fails to meet one of the other Local Plan polices but as the development is so 'sustainable' this overrides other policy considerations? Officers should be given the opportunity to reach such conclusions otherwise the weight of the SPD will diminish to a point where it loses its credibility.</li> </ol>	<p>The proposed Climate Change Statement brings information largely already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. Regarding outline applications, technical information is stated to be required at detailed design stage, not at the outset if that detail is not yet part of the application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. Noted.</p> <p>Each application will be determined on its own merits.</p> <p>Member and officer training will be undertaken following adoption of the SPD and then form part of regular training for Planning Committee members.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>6. What Member training will you put in place to ensure the Planning Committee takes the SPD into account?</p> <p>7. Will there be liaison between the LPA and its own Building Control team to assess different options put forward in the CCS? How will this work if the applicant doesn't know at the application stage (many don't) whether they will use LABC or Approved Inspectors?</p> <p>8. Have you thought how innovative design to meet the requirements of the SPD might conflict with Policy STR1 on Local Distinctiveness?</p>	<p>The developer will need to ensure that a scheme complies with Building Regulations. It should not make any difference whether this is achieved through LABC or an Approved Inspectors. Zero carbon and zero carbon ready buildings do not necessarily have to conflict with respecting local distinctiveness and will need to be delivered to meet national carbon reduction (2035) and zero carbon (2050) targets. Should the applicant consider that there is conflict between innovative design and local distinctiveness, the justification for the proposal should be articulated in the design and access statement.</p>
11 S Tonkin	Lacks a timescale for being capable of running without carbon emissions	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance to set a timescale to operate without carbon emissions.
15 L Tonkin	This is effectively guidance and recommended practice. If developers choose not to take it into account, there is no statutory enforcement. In the same way that the Local Plan stipulates 'a requirement for larger developments to have at least 50% affordable and social housing' and yet NFDC repeatedly passes developments with 25%.	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance or the adopted local plan policy to require zero carbon development.
19 New Forest East Constituency Labour Party	The proposals in this document come across as advisory and give a lot of "get-outs" for the developers. Would it be possible to update the Local Plan Policies to ensure there are mandatory elements?	The Local Plan review will continue to address climate change matters and would be the appropriate process to update any local plan policies.
20 Bloor Homes Southern	Bloor Homes supports the preparation of the Planning for Climate Change Supplementary Planning Document. The effects of climate change have the	Comment noted.

From	Representations	NFDC Response
	<p>potential to have long lasting impacts on development, as well as potentially contributing to GHG emissions.</p> <p>We believe that the Council’s aims to reduce operational carbon in buildings, reduce embodied carbon and ensure development is resilient to future climate change broadly aligns with the Governments ambitions to improve building standards over time. However, any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment (see response on costs under CCS2).</p> <p>We would note that in terms of operational carbon emissions it is the Government’s stated aim in the Future Homes Standard (FHS) consultation in 2019 that the 2025 FHS provides Net Zero Ready homes which are future proofed and do not require retrofitting to operate Net Zero, ‘We have said that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready’. The 2025 FHS consultation is due this year and will provide clarity on the overall carbon reduction required from new homes, as well as guidance on how this might be achieved.</p> <p>Currently the Building Regulations do not take account of embodied carbon, however it is noted that a number of national guidance documents including the RIBA 2030 challenge, LETI Design guidance and the Net Zero Buildings Standard set out guidance on the measurement and reduction of embodied carbon. Bloor Homes are exploring the impact of embodied carbon as part of the first step in reducing this impact. At this stage we would be cautious about setting specific embodied carbon targets until further information on the feasibility, deliverability and viability of potential targets have been considered. This would be best reserved for National Policy.</p> <p>In terms of adaptation the UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall. In respect of the climate projections the UK Climate Change Risk Assessment</p>	<p>Comments on the broad alignment between SPD and national policy objectives welcomed.</p> <p>The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. A best endeavours approach provides scope to take into account the wider planning balance including any evidence that achieving higher climate and energy standards would impact unacceptably on development returns.</p> <p>It is noted that Building Regulations do not address embodied carbon. The SPD does not set specific embodied carbon targets but requires that developers address the issue in their climate change statement.</p> <p>The SPD does not require developers to meet the cost of mitigating carbon from electric vehicle charging. However, on-site renewable energy generation will be an essential component of the transition to net zero carbon emissions in line with national policy.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>identifies likely impacts as a results of climate change, these in turn help support changes to policy and guidance to tackle the impacts of climate change. As such key issues affecting the built environment around subjects of flood risk, overheating, biodiversity, water efficiency have been incorporated into key guidance to mitigate these effects. Post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. Bloor Homes considers it unreasonable to assume that they, as a housebuilder, should effectively meet the cost of mitigating carbon from charging an electric vehicle.</p> <p>If it is the intention that best practice targets are to be included we believe these should be aligned with the RIBA 2030 Climate Challenge targets, these provide a more realistic set of targets in terms of cost and deliverability. In this context we recommend that the Best Practice element of Policy CCS1 is updated to reflect this.</p> <p>Specifications for new build fabric efficiency for residential development should target the operational energy targets set out in RIBA 2030 Climate Challenge, setting progressive targets from 2025 to 2030.</p> <p>As part of the consultation the Government also states it is the aim of the 2025 FHS to provide zero carbon ready homes which are future proofed and do not require retrofitting to operate Net Zero, 'We have said that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready. We intend to set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler. These homes will be future-proofed with low carbon heating and high levels of energy efficiency. No further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise. Our work on a full technical specification for the Future Homes Standard has been accelerated and we will consult on this in 2023. We also intend to introduce the necessary legislation in 2024, ahead of implementation in 2025'.</p>	<p>Comment noted, however, the Council consider that the Net Zero Carbon Toolkit which uses the LETI standard best practice standards, is appropriate for use in the SPD.</p> <p>Energy efficiency targets will not exceed Building Regulations requirements, as set out in the Written Ministerial Statement – Planning – Local Energy Efficiency Standards Update – 13/12/23.</p> <p>The SPD does not require the best practice objective (zero carbon in operation) and allows for development to meet the secondary objective (zero carbon ready).</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>While we believe the best practice objective (zero carbon in operation goes beyond national guidance and goes too far, we believe the provision of the secondary objective (zero carbon ready) is in alignment with national policy and guidance.</p>	
<p>21 R Kent</p>	<p>There would appear to be significant risk that this proposal ends up duplicating the requirements of the Building Regulations. It would be more efficient, logical and holistic if the requirements for addressing climate change and building fabric, requirement for on-site renewables / embedded carbon need to be set CENTRALLY and NATIONALLY and not subject to duplication / (mis)interpretation by local planning authorities.</p> <p>As we all know the UK planning system is in enough of a mess with inconsistency and incoherence between different planning authorities - the last thing we need is yet more piecemeal bureaucracy whereby LPAs are going to ask applicants to spell out what they will be required to do under the Regs anyway. In my opinion planning should become more centralised (by County, or even national) - most planning application simply need to adhere to National policy with only a small proportion that are subject to local idiosyncrasies, which could be covered by the necessary additional forms. It will be the case with the majority of planning applications in needing to adhere to the elements set out in this proposal. The key elements are covered by Parts G and L of the Building Regs.</p> <p>At a time when funding for local authorities is strained, let's waste time, effort &amp; money recreating the wheel. If a planning application is going to be built out it will need to comply with the Building Regs particular to that application. NFDC would bet better off investing resources in policing the implementation of Building Regs rather than creating more hurdles at planning. Applicants can promise the most highly performing insulation at planning, but then go on to install the cheapest mineral fibre. I pass building sites all the time with newbuilds with a bit of mineral wool loosely dropped into a 100mm cavity. No one is policing this, no one is checking and when it's all sealed up no one will know. Far better to require Building Control Officers / Approved</p>	<p>The Building Regulations and the Future Homes/Buildings changes planned to them (if they are implemented) have been widely criticised as falling well short of what can already be readily achieved by best practice approaches.</p> <p>The business-as-usual approach to development based on BR compliance also fails to address what can be achieved by good design to utilise natural/passive heating and cooling/ventilation to best effect, as the compliance assessment process takes the development design (regardless of any shortcomings) as a given.</p> <p>Where there is thematic overlap with BR, the SPD targets the initial design stage to improve the prospects for achieving BR compliance without recourse to sub-optimal bolt-on fixes such as air conditioning.</p> <p>The SPD will help to explain how to comply with policies STR1 &amp; ENV3 of the adopted Local Plan.</p> <p>Comment noted. The Council considers that to fully address climate change considerations it needs to implement building regulations and approach the issue at the planning/site design stage.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	Inspectors to be far more vigilant in checking with severe penalties for non-compliance with the Regs (Part L in particular).	
22 M Humber	Net zero requires brave decisions. Moving green belt areas to National Park boundaries. Building terraced Passive housing with triple glazing, using grey water, all roofs to have solar panels and high levels of insulation. Windows facing the sun. Occupants will have low costs for utilities. If not homes in the future will have to be retro fitted which will be costly.	Comment noted. The SPD supports implementation of adopted local plan policies within the bounds of the policy and government guidance.
26 Alex Lawton	About right	Comment noted.
27 Bargate Homes	<p>Table 1 (page 15) of the SPD details the items expected to be covered by Climate Change Statements which are set to become a validation requirement. Indeed, paragraph 44 of the SPD states that some of the requirements for these statements are challenging, given the scale and urgency of the climate challenge. Bargate Homes agree with this sentiment and are committed to taking meaningful steps to bring forward development which rises to this challenge.</p> <p>It is welcome that something of a 'sequential approach' to building design in meeting Future Homes standard is set out by the SPD, where developers are encouraged to go as far as may be possible in meeting this standard, whilst still acknowledging that this may not be achievable in all instances for any variety of reasons.</p>	Support and recognition that the SPD has some flexibility in approach is welcomed.
28 BDW Homes	<p>Raise concerns with the KPI targets for energy use and space heating, respectively 35 and 15 kWh/m<sup>2</sup>/year, and recommend that the heating KPI be removed and the EUI KPI be replaced with a range of values to allow for flexibility in design and typology.</p> <p>The space heating KPI is equivalent to PassivHaus standard (as the draft SPD notes). Typologies such as bungalows and 'room in roof' dwellings would struggle to achieve this due to their form factor. This standard would</p>	The KPIs are stated to be best practice values that developments should target achieving. They are an integral part of the independent Net Zero Carbon toolkit which is an indivisible part of the SPD document. They are not fixed targets that have to be met, and it is acknowledged that they may not always be achievable (see for example SPD paras 44-55 'Best practice and best endeavours').



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>require changes to the design of homes and layout of sites, there are supply chain and skills challenges to its implementation, and viability implications.</p> <p>Passivhaus is not required to achieve net-zero carbon. A recent report by the UK Green Building Council set out that achieving the equivalent of PassivHaus standards would amount to £263/m<sup>2</sup> of additional build cost, potentially creating a significant barrier to the entry of SME developers.</p>	<p>The intention of the SPD is that it will support the need to change the design of homes and layout of sites to achieve compliance with adopted local plan policies STR1 &amp; ENV3.</p> <p>It is agreed that zero carbon in operation can be achieved in other ways, but higher values for total energy use and space heating would mean that the building would require more energy (and cost) to run than a best practice example.</p>
<p>30 Stoford Developments Ltd</p>	<p>We fully endorse the objectives of the draft Planning for Climate Change SPD and consider it provides the right level of detail for addressing climate change in planning applications, to meet Local Plan requirements.</p> <p>We support the requirement to provide a Climate Change Statement to accompany a planning application containing information pertinent to climate change mitigation and zero carbon, and climate change adaption.</p>	<p>Support welcomed</p>
<p>31 Persimmon Homes</p>	<p>The aims and objectives of the draft SPD are laudable and supported in principle in terms of encouraging zero carbon ready construction, however, they are unduly onerous and place yet more burdens upon applicants - at a time when financial constraints have consistently increased across the sector. The requirements, both in terms of resource and the financial implications of these extra reports (Reports need to be outsourced and prepared by specialist consultants who obviously require a fee for their completion / production and have a lead in time for instruction and completion). Additional work will be required by the planning consultant / architect to complete a Climate Change Statement, but many schemes will be at an early feasibility stage and therefore will not be in a position to give precise answers to the questions sought in the Statement. Such requirements are better achieved by requiring development to meet the current Building Regulation standard in force at the time of construction /completion.</p>	<p>The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets.</p>

From	Representations	NFDC Response
	<p>We would direct you back to government advice contained in the National Planning Practice Framework (NPPF) Para 152 which talks about 'encourage and support' not regulate and obfuscate or add additional burdens to business.</p> <p>We would also recommend, that before adoption of the SPD, the LPA must ask itself the following questions as to their own internal capacity and expertise and be entirely satisfied with their ability to interpret and understand the breadth and depth of the reports the SPD is requiring in order for this additional cost to be meaningful;</p> <p>(a) Para 4 page 6 - As explained, much of the information requested may not be known at the early stages of application. The design and build stage often comes after the cost and delays in getting a planning permission (if forthcoming) in the first place.</p> <p>(b) Any such information submitted may need to change during the processing of the application when the LPA requires design amendments - so floor areas / volumes / detailed design will change - will the CCS need to be updated?</p> <p>(c) As with any planning policy - the requirement's must (amongst others) be clear, precise and enforceable. Who in the LPA will check the specifications on the drawings have actually been implemented? If the answer to this is 'no-one' or 'no capacity' or 'planners do not have the necessary skills to check' then the requirements are somewhat meaningless.</p> <p>(d) As with all design standards and Building Regulation requirements, these constantly change. It is highly likely that even during the processing of the application, the requirements will change – how will the LPA deal with this?</p> <p>(e) The LPA must make it clear as to the weighting placed upon this issue as a material planning consideration - i.e. are you going to seriously approve a planning application that in your opinion fails to meet one of the other Local Plan polices but as the development is so 'sustainable' this overrides other policy considerations? Officers should be given the opportunity to reach such conclusions otherwise the weight of the SPD will diminish to a point where it loses its credibility.</p>	<p>The proposed Climate Change Statement brings information largely already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. Regarding outline applications, technical information is stated to be required at detailed design stage, not at the outset if that detail is not yet part of the application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. Noted.</p> <p>Each application will be determined on its own merits.</p> <p>Member and officer training will be undertaken following adoption of the SPD and then form part of regular training for Planning Committee members. The developer will need to ensure that a scheme complies with Building Regulations.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>(f) What Member training will you put in place to ensure the Planning Committee takes the SPD into account and understands the figures and contents of officer reports?</p> <p>(g) Will there be liaison between the LPA and its own Building Control team to assess different options put forward in the CCS? How will this work if the applicant doesn't know at the application stage (many don't) whether they will use LABC or Approved Inspectors?</p> <p>(h) Have you thought how 'innovative design' to meet the requirements of the SPD might conflict with Policy STR1 on Local Distinctiveness? Which will take precedent? For example, a home designed to the latest eco home specifications but is not a replica of the surrounding development?</p>	<p>It should not make any difference whether this is achieved through LABC or an Approved Inspectors.</p> <p>Zero carbon and zero carbon ready buildings do not necessarily have to conflict with respecting local distinctiveness and will need to be delivered to meet national carbon reduction (2035) and zero carbon (2050) targets. Should the applicant consider that there is conflict between innovative design and local distinctiveness, the justification for the proposal should be articulated in the design and access statement.</p>
<p>32 McCarthy Stone</p>	<p>Thank you for the opportunity to comment on the New Forest District Climate Change Supplementary Planning Document (SPD) consultation ('draft SPD'), June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. Please find below our comments on the consultation.</p> <p>Whilst it is acknowledged that para 2 of the draft SPD states that it sets 'out best practice approaches or standards that developers are encouraged to target or to adopt, to take all practicable steps to decarbonise the running of buildings; to meaningfully reduce embodied carbon in construction; and to ensure development is climate change adapted' and that 'The aim is to ensure that designs are climate change optimised before planning applications are submitted'. It appears that the aim of the draft SPD is to require developers to deliver 'net zero' development as it requires information to be provided with a planning application to meet such standards and for developers to identify why such targets are not being delivered.</p> <p>The Council should note that the PPG on 'Plan Making' identifies the role of supplementary planning documents. This identifies at paragraph: 008 Reference ID: 61-008-20190315 that 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development</p>	<p>The Local Plan policies that the SPD provides supplementary guidance on are noted in the SPD document at appendix A. As the Local Plan does not have a policy that explicitly sets a zero-carbon requirement, it is correct that the SPD cannot require it, and it does not. The SPD <i>encourages best endeavours</i> towards that objective with a secondary objective of being 'zero carbon ready' that reflects Policy STR1 which requires that development be future proofed for climate change, and also reflects emerging national policy (such as the Future Homes standard, consistent with NPPF para 152 guidance that 'the planning system support the transition to a low carbon future in a changing climate' and 'should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions').</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development’.</p> <p>Given the Local Plan policies, any requirement or SPD should remain in line with Government targets and the proposed changes to the building regulations. There is considerable momentum from Government in preparing enhanced sustainability standards and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years and aligning the Council’s requirement for carbon neutral development with those of Government would be consistent with national policy.</p> <p>Recommendation:  <input type="checkbox"/> The SPD is either not taken forward as Net Zero Carbon development is being dealt with via the Building Regulations or the draft SPD should be substantially amended so that the guidance aligns with the timetable for the changes to the building regulations.</p> <p>Thank you for the opportunity for comment.</p>	<p>The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 &amp; ENV3.</p> <p>Comment noted. There is no need for the SPD to repeat the requirements of Building Regulations. It will, however, support the implementation of adopted local plan policies STR1 &amp; ENV3 in relation to the design of buildings and layout of the site.</p>
<p>35 Ringwood Town Council</p>	<p>Overall, this is an excellent SPD. Like the similar work in the Ringwood Neighbourhood Plan, it is based on the LETI guidance, the Net Zero Carbon Toolkit, the use of Building for a Healthy Life and using standards such as BREEAM. It is strongly supported. The following comments are made with a view to improving certain aspects and are not intended to be critical of the overall aims of the SPD.</p> <p>It is also worth noting that a significant proportion of carbon used in a development is not in the buildings themselves. Concrete and tarmac have very high footprints. It would be good to see an SPD addressing ‘abnormals’, which would be within the scope of ENV3. High ‘abnormals’ costs in financial viability assessments likely link with similarly high carbon costs. It is hoped that future Strategic Site allocations will take this into account.</p> <p>It could go further. The concept of ‘net zero ready’ to ‘future proof’ is flawed for new builds. Why wait until tomorrow when the implementation can be</p>	<p>Support welcomed.</p> <p>Comment on materials used for construction of roads/pavements within a site are noted. The SPD has taken an approach to embodied carbon that is considered appropriate in terms of adopted local plan policies and government guidance.</p> <p>The SPD can only supplement adopted local plan policies. Changes to the Building Regulations are likely to prevent the installation of gas boilers from 2025.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>done today? However, we accept that this is the wording in the current Local Plan. No new building should have gas-supplied boilers. If this SPD allows that, it is flawed.</p> <p>On the table on p15, we would like to see more ‘Y’s. Heat pumps in minor developments – why not? Smart energy systems in non-domestic building – why not? We are also unconvinced by categories on this table. “2c Option to purchase PV pre-installation” – why? To get to zero operational energy, renewables are required. For most builds, these will be PV, although roof-based wind turbine options are becoming available. “Design to Building for a Healthy Life” – why ‘Y’ for only developments of 50+ dwellings? Add in “Rainwater capture/reuse”? More ‘Y’s and better categories please.</p>	<p>The SPD is a step toward zero carbon consistent with current local plan policies. Further steps such as setting fixed minimum standards would need to be introduced as part of a future local plan review. The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments. Building for a Healthy Life is more relevant for larger developments.</p>
38 National Highways	We have reviewed this consultation and have no comments.	Comment noted.
39 Fiddlesticks Farm	<p>Local authorities should consider climate change mitigation and adaptation throughout the Local Plan and application process, and hence we support NFDC’s broad strategy and approach, based around the following themes (Table 1):</p> <ol style="list-style-type: none"> <li>1. Minimising energy demand targeting net zero carbon in operation;</li> <li>2. On-site renewable energy generation;</li> <li>3. Reducing embodied carbon emissions;</li> <li>4. Sustainable travel;</li> <li>5. Avoiding overheating;</li> <li>6. Flood risk reduction and sustainable urban drainage;</li> <li>7. Drought resilience and using water efficiently.</li> </ol> <p>We support NFDC in seeking to make progress against the above aims, and we recognise that as a major housing site, development at Fiddlesticks Farm should positively address each. As a landowner, our client attaches great value to sustainability and creating a positive legacy, and these will be prioritised when a development partner is selected. Many climate change</p>	Support noted and welcomed.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>mitigation and adaptation measures relate to the detailed design stage and so we do not provide detailed commentary now.</p> <p>We do not offer detailed commentary on validation requirements and the wording of individual policies at this stage, other than to encourage NFDC to maintain appropriate flexibility in its approach. In saying this we are mindful that (i) this SPD affects all forms of development in the District; (ii) individual developments are affected differently by financial, viability and other issues; and (iii) climate change mitigation/adaptation is a rapidly evolving field, such that the specific measures to deliver sustainability will evolve and improve over time.</p> <p>We look forward to receiving updates as this SPD progresses and to working closely with NFDC on Local Plan matters.</p>	
40 The Coal Authority	As New Forest District Council lies outside the defined coalfield, the Planning team at the Coal Authority has no specific comments to make.	Comment noted.
42 P Stickley	Thank you for providing a link to your email inbox. I am impressed that you undertake to seek public opinion about the way such policies are at least drafted; I hope that this attitude is deeply entrenched in other LAs.	Comment noted.
43 Natural England	<p>Climate change is already having a profound impact on nature and society in England and across the world. The projected scale and rate of climate change, coupled with existing environmental pressures, has serious implications for the natural environment and the services it provides to society. In response, many local authorities across England are formally declaring a climate change emergency and are now looking for practical steps to address it. The faster that greenhouse gas emissions can be reduced, the more the overall pressure on the natural environment will be reduced. The land use planning and development process is a key sector in driving down emissions and fighting the impacts of climate change.</p> <p>Your developing SPD provides a prime opportunity to deliver local but necessary measures in tackling this existential problem.</p> <p>Natural England welcomes your Council’s development of a Climate Change SPD that promotes mitigation and adaptation to climate change through various methods. We welcome that developers will be required to submit a</p>	<p>Comments noted.</p> <p>Advice on nature-based mechanisms to address climate change is welcomed. SPD to be amended to include references to nature-based solutions and signpost the Natural England report Carbon Storage and Sequestration by Habitat 2021 and the</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

From	Representations	NFDC Response
	<p>Climate Change Statement (CCS) to demonstrate how they will implement mitigation and adaptation measures such as the integration of low carbon technologies and renewable energy generation, energy efficient design, reduced carbon emissions from construction phase, sustainable travel and the integration of green and blue infrastructure into development design such as Sustainable Urban Drainage Systems (SuDS) and planting. We welcome the incorporation of the Net Zero Carbon Toolkit (NZCT), updated for the NFDC circumstances. However, overall, we feel the SPD can be much stronger in recognising and requiring the role of the natural environment in tackling climate change. Please see more detailed advice and recommendations below, particularly on nature-based solutions.</p> <p>The SPD provides a prime opportunity for the Council to set an ambitious climate-specific target(s) 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. Meaningful targets should be monitorable over the local plan period to demonstrate the effectiveness of local policy in addressing climate change, and to ensure appropriate remedial action can be taken as necessary.</p>	<p>Council’s informal BNG guidance and the forthcoming Biodiversity SPD.</p> <p>The setting of more detailed targets is considered more appropriate as part of a local plan review, which would also provide the opportunity to set minimum standards rather than to encourage better practice.</p>
<p>44 Cranbourne Chase AONB</p>	<p>The adopted AONB Management Plan has climate change running through it so it should, I suggest, be a reference document for those parts of NFD that are in this AONB.</p> <p>I read that many of the proposals relate to development and may, therefore, come within the overview of Building Control.</p>	<p>Cross reference to the AONB Management Plan added to the SPD.</p>

**Benefits and costs of Net Zero carbon development**

Q2. Would you be prepared to pay more to rent or purchase a home or premises that had higher energy efficiency standards and that was more climate change resilient, but was otherwise of a comparable standard to current new builds?

From	Comment	NFDC Response
05 A Ford	A stronger plan is needed for existing homes	Agreed, but beyond the scope of this SPD which relates to new development.
09 R Palmer	Higher energy efficiency standards and developments being prepared for a zero carbon future (e.g. renewable energy, heat pumps, EV charging) will help to reduce costs for people living there, even with higher rents/house prices. It's important for NFDC to communicate this to prospective house buyers on the benefits of switching to zero carbon technology. However, this should not be an excuse to charge significantly more for properties than needed so as to discourage people.	Comment noted.
10 Chapman Lilley Planning	This will inevitably put up the price of a home and make the possibilities of first time buyers even less affordable than it is already. It will also put up rents. What is the point in having a low carbon building if you can even afford a mortgage to get into it? Are you inadvertently discriminating against lower income families and preventing them from getting a home? Your equalities statement should be updated to reflect this consideration. Have you assessed the full additional costs of providing a fully zero carbon building on the purchase price?	Wider industry evidence cited in the SPD indicated that cost differentials typically range from 2-6% and are likely to reduce over time. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does automatically translate into an equivalent dwelling cost increase. Household running costs form part of the evaluation of what mortgage applicants can afford to borrow and spend. The lowest cost market housing choices are almost always in the existing housing stock. The Council does not agree that the implementation of adopted local plan policies STR1 & ENV3 will increase purchase prices as developers will generally set prices at the maximum the market will bear.



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		There is no policy requirement to implement the best practice measures contained in the SPD.
11 S Tonkin	The long-term costs will be much greater if we don't get a handle on this very soon!	Comment noted.
12 B Lord	Page 15 - Table 1 - Line 4b Design to Building a Healthy Life. The building of 10-49 homes should be seen as major development, therefore No should be changed to Yes in the column.	The principles contained in the Design to Building a Healthy Life document and that are given a green, amber or red assessment could be difficult to achieve on developments of between 10 and 49 dwellings as they contain criteria that relate to developments that would be typically larger than 50 dwellings.
13 A Witt	Given the small additional cost of meeting the standards and the likely length of mortgage applicable to the dwelling the cost is minimal and should not be a barrier to making a development sustainable.	Comment noted.
15 L Tonkin	Climate change is not a choice, it is something we all have to mitigate, now.	Comment noted.
19 New Forest East Constituency Labour Party	We feel the increased cost of rent or purchase should be offset by lower running costs and a higher resale value for the occupant/owner. Plus the added benefit of slowing down climate change.	Comment noted.
20 Bloor Homes Southern	Any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment. In adopting the SPD the Council should give consideration to the applicability of any new guidance to current applications. In particular the best practice objectives set out in the SPD potentially add significant additional cost into development which will not have been considered as part of the development viability. Such additional cost may also undermine the viability testing that underpins the Council's CIL Charging Schedule. Any additional requirements should be restricted to new applications coming forward after the adoption of the SPD and cannot be reasonably retrospectively applied.	Wider industry evidence cited in the SPD including from the Climate Change Committee indicated that cost differentials typically range from 2-6% and are likely to reduce over time, especially as low or zero carbon operation becomes a starting point for stock housing designs rather than being treated as a retrospective fix to existing designs that should be evolved. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does not automatically translate into an equivalent dwelling cost increase as developers will

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		<p>generally set prices at the maximum the market will bear. However, lower running costs would be reflected in a price premium compared to those without climate change measures.</p> <p>There is no policy requirement to implement the best practice measures contained in the SPD.</p> <p>The SPD will be applied to all outstanding planning applications at the time it is adopted as is the case with all new planning policy documents.</p>
22 M Humber	Passive housing would be cheaper to run and would be better than the standards we have at present. This is a loaded question.	Comment noted.
26 Alex Lawton	May pay more if the standards achieved were commensurately higher. The costs of achieving higher than regulatory standards at the time of construction are lower than retrofitting properties to higher standards which will become necessary to cope with the climate crisis. The benefits in terms of ongoing reduction in operating costs and increased comfort of properties will only increase as the climate worsens.	Comment noted.
30 Stoford Developments Ltd	Our buildings are designed to minimise the embodied carbon in construction, and to reduce the amount of energy required to run the facilities.	Comment noted.
31 Persimmon Homes	<p>The 'upfront' additional costs of implementing these proposals will need to be added to the dwelling market price, which will in turn price many first-time buyers and renters out of the market – surely that is not your intention?</p> <p>As explained above, these requirements will inevitably put up the price of a home and make the possibilities of first-time buyers even less affordable than it is already. It will also put-up rents. What is the point in having a low carbon building if you can't even afford a mortgage to get into it? Are you inadvertently discriminating against lower income families and preventing them from getting a home? Your equalities statement should be updated to</p>	<p>Wider industry evidence cited in the SPD indicated that cost differentials typically range from 2-6% and are likely to reduce over time. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does automatically translate into an equivalent dwelling cost increase.</p> <p>Household running costs form part of the evaluation of what mortgage applicants can afford to borrow and spend. The lowest cost</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>reflect this consideration. Have you assessed the full additional costs of providing a fully zero carbon building on the purchase price?</p>	<p>market housing choices are almost always in the existing housing stock. The Council does not agree that the implementation of adopted local plan policies STR1 &amp; ENV3 will increase purchase prices as developers will generally set prices at the maximum the market will bear.</p> <p>There is no policy requirement to implement the best practice measures contained in the SPD.</p>
<p>32 McCarthy Stone</p>	<p>Whilst the Council's commitment to meeting net zero carbon emissions and climate change targets are commendable the council do not appear to have a sound planning policy basis to require net zero with the relevant policies, as detailed in paragraph 1 of the draft SPD being, STR1 that states 'All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by: ... vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology' and policy ENV3 'New development will be required to: ... v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective...'</p> <p>Consequently, the SPD should not be taken forward as this would be contrary to Paragraph: 008 Reference ID: 61-008-20190315 of PPG. Requiring developers to build to net zero and other carbon reduction requirements goes beyond the adopted Local Plan policy and has a cost implication that would add an unnecessary financial burden to development again contrary to Paragraph: 008 Reference ID: 61-008-20190315 of the PPG.</p>	<p>There is no policy requirement to implement the best practice measures contained in the SPD. The SPD does not require development to be net zero carbon. The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 &amp; ENV3.</p>
<p>33 New Milton TC</p>	<p>Buyers should not be forced to pay more at a time when all costs are rising and salaries are not keeping up.</p>	<p>The SPD would have no effect on the existing housing stock, which makes up the vast majority of homes for rent or sale.</p>
<p>35 Ringwood Town Council</p>	<p>May pay more if the standards achieved were commensurately higher.</p> <p>We believe people in Ringwood will be prepared to pay more. As a relatively affluent area, a modest increase in capital outlay for the return of lower</p>	<p>Comment noted.</p>

	<p>operating costs would be attractive to most. A minor omission relates to so-called Green Mortgages, where the ability to more easily afford mortgage repayments is recognised by building societies. They have presumably carried out the cost-benefit analysis, so we won't comment further. We note that a 10%, say, increase in build cost corresponds to something like a 3% of the sales price of the property, as implied in paragraph 32.</p>	
--	---	--

**Minimising energy demand targeting net zero carbon in operation (CCS1)**  
 Q3. What are your views on the proposed best practice objective that new buildings should be zero carbon in operation wherever possible, and at the very least future proofed to be zero carbon ready?

From	Comment	NFDC Response
05 A Ford	Existing buildings need to be carbon neutral as well as new ones.	Comment noted – although beyond the scope of this SPD which relates to new development.
08 P Thomas	<p>The UK and other affluent countries need to lead the way in reducing CO2 production to allow for countries which will not have the funding necessary to reduce their CO2 production.</p> <p>The country also needs to set higher CO2 reduction standards to mitigate existing buildings which will be more difficult to insulate e.g. traditionally constructed and heritage buildings.</p>	Comment noted. Existing buildings are beyond the scope of this SPD which relates to new development.
10 Chapman Lilley Planning	<p>1. The preamble to CCS1 (Para 45) explains 'developers need to ensure their designs are capable of meeting the Future Homes and Future Buildings Standards.' As explained previously, at the initial planning application stage, this level of detail is not always known - plus the LPA will inevitably ask for amendment (rarely does it suggest the building be made larger!) so all these calculations will quite possibly change during the application process. Once approved, the application will go through the Building Regulations process and internal details and specifications no doubt change again.</p> <p>2. Para 48 - is it really necessary to continually update the CCS? This is yet more bureaucracy and paperwork which relates to more burdens upon the applicant?</p> <p>3. As ever, who from the Council is going to actually check the internal incredibly detailed specifications are in accord with the CCS? What are you going to do if they are not?</p> <p>4. If you haven't done so already, please speak with your Economic Development Officer regarding the requirement at Para 49 to obtain a BRE New Construction 'excellent' standard. I know for a fact that a LPA in Dorset removed this onerous requirement from its own Local Plan, as the feedback</p>	<p>As the Future Homes and Future Buildings Standards reflect Building Regulations, there is no change to the situation that developers will need to ensure their designs are capable of meeting building regulations.</p> <p>Some degree of updating may be necessary depending on the changes to an application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. This an existing requirement in the adopted local plan and can only be changed when the local plan is reviewed.</p>

	<p>from the commercial property sector was that in effect, it would stifle new build industrial / commercial property and therefore cause the District to lose jobs. Have you factored this commercial building viability/ job creation / retention into your equalities statement and the effect this will have on job creation and retention?</p> <p>5. Will the submission of a CCS be a validation requirement? If so, who will be qualified to check they are adequate?</p> <p>6. Who is going to check that the detailed internal design of the building allows it to be 'future proofed'?</p> <p>7. The requirement (Page 20) for 'Inclusion of 'smart' energy use and heating control and monitoring systems' is surely just going to be an annotation on a plan with no real meaning for the planner.</p> <p>8. CCS 1b states at one point '.....If this commitment is made the heating system details can be dealt with by a planning condition' I would respectfully suggest this would be classed a ultra vires and exceeds what is necessary to grant planning permission. It does not meet the 6 tests at Para 55 of the NPPF. Again - who is going to check?</p> <p>9. CCS 1c providing 'calculations of the space heating demand.' again exceeds what is necessary to grant planning permission and unduly onerous on the applicant. How will this calculation be checked in any event?</p> <p>10. An additional requirement is revealed in CCS 1e 'future proofing statement' is yet another piece of paperwork required for no obvious reason.</p> <p>11. CCS 1f Option to purchase heat pump.....'buyers purchasing off-plan should be given the opportunity to purchase from the developer heat pump system pre-installation at a discounted supplementary cost.' All reference to this should be deleted - it is not relevant to planning and cannot be enforced.</p>	<p>Yes, ultimately there will be a planning judgement as to whether it is adequate, in a similar way to say a Transport Assessment, for example. The developer would be expected to address this in the Climate Change Statement.</p> <p>There is no requirement to provide this although it is recommended.</p> <p>If the developer does not wish to include a low carbon energy efficient heating system it cannot be compelled to do so, subject to compliance with Building Regulations, although it would need to state this in its climate change statement. The reference to the condition will be deleted. The information is to assist with assessing whether the development complies with Policies STR1 and ENV3 of the adopted local plan. Developers should be considering such matters at design stage prior to applying for planning permission.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>If the developer does not wish to include renewable energy generation it cannot be</p>
--	--	--

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>12. CCS 2a and CCS2b - as explained above, it is not always known at the planning application stage. Does the LPA routinely check (a) that any renewable energy required by a planning condition is actually installed (b) is working in accord with the approved specifications and (c) continues to work for the lifetime of the development?</p> <p>13. CCS2c - see comment 11 above - not relevant to planning and not enforceable so should be removed.</p> <p>14. CCSC3a and b - as explained above - the construction process may not yet be known.</p> <p>15. CCS5a - as explained earlier, 'choice of building materials surfaces and hard landscaping' if fully sustainable in accord with the SPD may conflict with the desires to keep developments 'locally distinctive' - there needs to be more guidance upon how this conflict might be overcome.</p> <p>16. CCS5a - the Good Homes Alliance early stage overheating tool requirement is the THIRD additional document being requested by the LPA</p>	<p>compelled to do so, although it would need to state this in its climate change statement.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement.</p> <p>Comment noted.</p>
11 S Tonkin	<p>No timescales for when future-proofing options are to be implemented. Too many exemptions for eg heat-pump or solar PV pre-installation options, SUDs, reducing embodied carbon.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
12 B Lord	<p>There's no indication given as to who will complete the CCS. It must be completed by a competent, qualified consultant (like the Ecology Statements, for example) and should not be left to the developer/householder to complete.</p>	<p>The Council considers that the developer/applicant will need to complete the climate change statement.</p>
15 L Tonkin	<p>Recommended not compulsory, if developers choose to ignore it, then they will. All the technologies are there to make zero carbon houses now, they do not have to be zero carbon ready - that is a get out clause.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
19 New Forest East Constituency Labour Party	<p>The best practice is good, but this should be more appear more explicitly in the Local Plan Policies to ensure Councillors and Planning officials have a clear mandate for approving/rejecting planning applications.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>

<p>20 Bloor Homes Southern</p>	<p>The current Building Regulations focus on achieving a set carbon reduction over previous iterations, i.e. Part L 2021 looks to achieve a 31% carbon reduction over Part L 2013, with the 2025 FHS looking to achieve a 75-80% carbon reduction over Part L 2013. While it is noted minimising energy demand is a route to reducing emissions no specific space heating or energy intensity targets are set. A recent decision by an Inspector in respect of the Examination of the Salt Cross Village Area Action Plan (AAP) concludes, that in setting similar energy and carbon targets for development to those in Policy CCS1, there are inconsistencies between the approach set out in Policy 2 and the national policy position and that the requirements set out are not reasonable and was judged a reason for amending this requirement in favour of aligning with national policy.</p> <p>The Government's Future Homes Standard Consultation in 2019, notes, 'as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.'</p> <p>Paragraph 32 includes an estimate of potential cost uplifts for delivering net zero operational homes of 2%-6% above the current Part L 2021. This is based on information prepared for Winchester City Council and notes that the costs shown are correct as of Q2 in 2022, since then inflation has had a significant impact on UK building costs and these are likely out of date. Costs and viability can also vary significantly based on location and in the context of site specific constraints. To be considered sound new policy requirements should be supported by a viability assessment, before any requirements that go beyond current policy and national guidance can be adopted the Council needs to provide evidence to confirm these are viable.</p> <p>Importantly it is also noted that these costs represent 'those anticipated for a moderately experienced project team'. The Government's 2019 FHS consultation and response set out the rationale for implementing a staged approach to reducing emissions, largely in response to capacity and skills in the market to deliver the required changes. In particular this notes the</p>	<p>There is no policy requirement to implement the best practice measures contained in the SPD. The SPD does not require development to be net zero carbon. The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 &amp; ENV3 and it is helpful if developers consider these matters at design/planning application stage.</p> <p>Comment noted – changes to the Building Regulations are currently the subject of consultation.</p> <p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice and assist with assessing whether the development complies with Policies STR1 and ENV3 of the adopted local plan. Net zero operational homes will likely attract an increased sale price due to lower running costs.</p> <p>There is no policy requirement to implement the best practice measures contained in the SPD.</p>
--	---	---



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>requirements to scale up and upskill the delivery of heat pumps. In setting a requirements which go beyond the Building Regulations there are likely to be significant increased costs initially associated with upskilling, changing supply chains etc which are not considered in the Winchester viability assessment before the sector becomes experienced in delivery.</p> <p>Furthermore the total energy target of 35kWh/m2/yr includes both regulated and unregulated energy. While Bloor Homes supports the delivery of low carbon homes it is considered any targets should be restricted to regulated energy only. As a housebuilder Bloor Homes only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate.</p> <p>(See additional information for remainder of the response for CCS1)</p>	<p>Comment noted. Developers are not being asked to control the future unregulated energy consumption but to ensure that sufficient generation capacity will be provided to meet likely demand.</p>
21 R Kent	<p>A national matter (building regulations), not a local one.</p>	<p>The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 &amp; ENV3.</p>
22 M Humber	<p>Planning should be made easier and quicker to enable zero carbon houses. Passive Houses. Builders and developers should be educated in passive housing aims and given directives to abide to. All properties to have Solar panel. Use grey water, triple glazing, heat source pumps, terraced houses, bicycle sheds, cycle paths and safe walking routes for schools and shopping.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
24 M Smith	<p>Should apply to small developments as well.</p>	<p>The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments.</p>
26 Alex Lawton	<p>Does not go far enough, I think the proposed best practice objective are about right.</p> <p>However I am sceptical about the benefit of future proofing buildings to be zero carbon ready. In practice this may give developers a way to avoid best practice and leave homeowners with a bill to retrofit their property in future</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		The intention of ‘future proofing’ buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.
27 Bargate Homes	<p>It is acknowledged by the SPD that, in some instances, air-source heat pumps may not be available or viable for installation on any or all properties within a new residential development. In such instances, CCS 1e makes an allowance for a statement to be made setting out the works required to install a heat pump system in the future, including any associated building fabric and other upgrades necessary to ensure the occupier comfort in colder months. This is a welcome and pragmatic approach for specific instances. The same applies for CCS1f, which allows the option for purchasers to buy a property with a heat-pump pre-installation (in instances of financial unviability, for example).</p> <p>The approach endorsed by CCS 1b and CCS 2a is for air source heat pumps and PV solar arrays to be installed on all properties. One issue with this approach is that major new development may not have the capacity for both large PV arrays and heat pumps. We’ve consulted with Briary Energy (independent energy assessors) who have advised that many local providers confirm that this is the case on multiple developments already. With increased and much-needed uptake on these technologies, this issue may continue to occur, so it is welcome that allowances are made in the SPD for ‘best practicable outcomes’, discussed further below.</p>	<p>Comment noted.</p> <p>Comment noted.</p>
30 Stoford Developments Ltd	All our buildings systems work to reduce energy, such as motion/sunlight-controlled lighting, leak detection, air source heat pumps. Energy use is monitored through intelligent sub-metering and building management systems to provide live data, allowing occupiers to see where energy is being used. These measures further contribute to minimising the use of energy.	Comment noted. Examples of best practice are welcomed.
33 New Milton TC	About right but design and build process changes to meet higher development energy performance standards may discourage small developers.	The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments which are often promoted by small developers.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

<p>34 New Forest Friends of the Earth</p>	<p>“Secondary objectives: Where net zero carbon in operation cannot be achieved currently, buildings should aim to be zero carbon ready”</p> <p>NFFoE Comment: Too easy for developers to get out of any innovation for net zero carbon design. Suggest replace “should” with “shall”.</p> <p>“If a heat pump or other efficient low carbon heating system is demonstrably not practicable, or net zero carbon readiness cannot reasonably be achieved, the building should be future proofed: designed to reduce energy demand and CO2 emissions as far as is currently practicable, and to minimise the cost and disruption of retrofitting the building to run efficiently with a heat pump system in the future”</p> <p>NFFoE Comment: If the building can be retrofitted with a heat pump system in the future why is fitting it at the time of building not practical ? (Heat pumps are much easier to install at the onset than retrofitting).</p> <p>“If heat pump installation is demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, buyers purchasing off-plan should be given the opportunity to purchase from the developer heat pump system pre-installation at a discounted supplementary cost.”</p> <p>NFFoE Comment: Too vague, easy for developers to get out of heat pump installation. What is the criteria for heat pump installation to be unfeasible on the grounds of financial viability? The minimum percentage for the discounted supplementary cost for heat pump purchase by a buyer needs to be quantified.</p> <p>Outside flues (vertical through roofspace or horizontal walls) or chimneys are not mentioned in the SPD for design of new housing. These should not be allowed to be incorporated in new housing as it may encourage the retrofitting of carbon intensive gas boilers or highly polluting wood burning stoves by the buyer after purchasing. The flues are also very inefficient at reducing heat loss in the winter.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p> <p>The installation of heat pumps cannot currently be required through Building Regulations and any requirement through planning policy would have to be achieved through a review of the local plan or national policy. The intention of ‘future proofing’ buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.</p> <p>The presumption against chimneys as part of the design of new development may result in design that is not in accordance with local character in some instances.</p> <p>This issue will be addressed through the Building Regulations. The current Future Homes and Buildings Standards consultation</p>
---	---	--

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>The avoidance of a gas or oil-fired boiler should be mandatory. If a heat-pump is not convenient due to the siting of the development then electric storage heating (using the dwellings PV and energy storage to minimize the cost) should be required.</p>	<p>on proposed changes to the Building Regulations states, ‘we do not expect fossil fuel heating, such as gas, hybrid heat pumps and hydrogen-ready boilers, will meet these standards.’</p>
<p>35 Ringwood Town Council</p>	<p>These are excellent features of this SPD, but could go a bit further. Where a building cannot be made zero carbon in operation on site, consideration should be given to off-site alternative options. For example, fitting solar panels or heat pump technology to a community building. As a last resort, it could be a Grampian-type condition. ‘Future proofing’ need not apply.</p> <p>Also, it is our opinion that there should be no new building that cannot be adequately served by a heat pump system, given a ‘fabric first’ approach to energy efficiency. Even for a retrofit, there are not that many, and these tend to have protection issues, such as being a listed building, rather than a technical issue. Again, we suggest mitigation over permission.</p> <p>We would like to see more in the SPD about commercial developments and BREEAM Excellent certification beyond just water consumption for developments of 250-999 m2 GIA required by IMPL2.</p>	<p>The need for off-site options is likely to be relatively rare and the preference will be for on-site solutions. Whilst developers could propose an off-site option, the Council does not wish to specifically encourage this option.</p> <p>The SPD cannot require heat pump systems, although the current Future Homes and Buildings Standards consultation on proposed changes to the Building Regulations would mean that fossil fuel systems would not comply with Building Regulations.</p> <p>The SPD includes commercial development as can be seen in Table 1, albeit there are a couple of exceptions which apply to just residential development.</p>
<p>39 Fiddlesticks Farm</p>	<p>The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.</p>	<p>Comment noted.</p>
<p>41 L Everitt</p>	<p>What level of electricity use should be expected in a dwelling? This information is already available via SAP tests but not necessarily clear to new residents.</p>	<p>Best practice ‘energy use intensity’ benchmarks are provided (35KWh per square meter per annum, calculated using gross internal area).</p>
<p>43 Natural England</p>	<p>It is acknowledged that the main purpose of the SPD is to provide guidance to prospective developers within the district. However, we recommend the Council also seeks to set targets to help existing development reach net zero,</p>	<p>Existing development is out of scope for this SPD which relates to new development, but could form part of future iterations of the</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>for example via a strategy for retrofitting measures (e.g. SuDS, green infrastructure, and energy/water efficient fixtures/fittings in Council owned stock). Public greenspace management can also be optimised to help address climate impacts as discussed above.</p>	<p>Councils Climate Change and Nature Emergency Strategy and Action Plan.</p>
--	--	---

**On-site renewable energy generation (CCS2)**

Q4. What are your views on the proposed best practice objective that new buildings should, wherever practicable, provide sufficient renewable energy generation on-site to run the building? [Agree/ Disagree / No comment or don't know]

From	Comment	NFDC Response
05 A Ford	Every effort should be made.	Comment noted.
09 R Palmer	Solar is cheap and an obvious choice for residential buildings.	Comment noted.
10 Chapman Lilley Planning	See earlier comments. Who checks it is installed, who checks it is working and producing the predicted energy savings and who checks to see if it is in place and working for the lifetime of the development?	It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way.
11 S Tonkin	Too many exemptions for eg heat-pump or solar PV pre-installation options.	The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
15 L Tonkin	The technology is available to make every house self-sufficient in energy now. This is what the standard should be, retrofitting should not be necessary.	The SPD cannot set policy to make every new house self-sufficient in energy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice. The intention of 'future proofing' buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.
19 New Forest East Constituency Labour Party	Yes, we totally agree. Again, this should be explicit in the policies.	Support welcomed.
20 Bloor Homes Southern	While Bloor homes supports the provision of renewable energy as part of new development this should be provided in the context of national guidance and	

	<p>Building Regulations. Furthermore the generation target 120kWh/yr/m<sup>2</sup> of building footprint is not considered deliverable.</p> <p>The 2025 FHS consultation due this year is expected to require homes to achieve a 75-80% carbon reduction beyond Part L 2013. This is likely to require new homes to include the provision of low carbon heating, such as heat pumps, alongside Solar PV to provide onsite energy generation. While the Energy Act allows Council's to set energy targets beyond policy, the Governments Future Homes Standard Consultation in 2019, notes, 'as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.'</p> <p>With regards to the renewable energy target of 120kWh/yr/m<sup>2</sup> of building footprint we do not believe this is an achievable objective. For context below a worked example is included</p> <p>Example – 90m<sup>2</sup> three bedroom house Footprint 45m<sup>2</sup> Energy demand required – 5,400kWh/yr Energy generated / kWp of Solar – 850 kWh/kWp System size required– 6.4kWp Area of PV /kWp – 5m<sup>2</sup>/kWp Area of PV required – 32m<sup>2</sup></p> <p>As set out to meet this target on a typical three bedroom house would require around 32m<sup>2</sup> of PV. A typical three bedroom house has c.32m<sup>2</sup> of roof space, reducing to c.24m<sup>2</sup> of available space when taking into account areas around the edge of the system. This is significantly less than the roof area required.</p> <p>Other development types may include dormer windows, roof lights etc to provide a mix of design which is keeping with the design and character of the area, setting this best practice requirement will stifle design and the character of development.</p> <p>In addition, as a housebuilder Bloor Homes only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately</p>	<p>The target to provide renewable capacity for the total operational energy requirement is a target not a requirement. If the achievable renewable energy generation capacity is below this then it should be expressed as a percentage of the total operational requirement and a justification will need to be provided if less than the regulated operational energy use.</p> <p>Comment noted. Developers are not being asked to control the future unregulated energy consumption but to ensure that sufficient generation capacity will be provided to meet likely demand. The suggested change would mean that the best practice objective would be unlikely to achieve</p>
--	---	---

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate. In this context we would revise Policy CCS2 as below, further amending Part 2b in line with these proposed changes.</p> <p>2. On-site renewable energy generation Best practice objectives: On-site renewable energy generation should be provided wherever it is practicable to do so, wherever possible sufficient to at least meet the regulated energy use of the development to achieve net zero carbon development in operation.</p>	renewable energy generation that could meet total operational demand.
21 R Kent	If possible, buildings should be net energy generators. But again, this should be covered by national policy, not local policy.	Comment noted.
22 M Humber	Every building should have solar panels. There could be group underground heat source pumps. Large triple glazed windows a high standard insulation means heat is preserved. Large window facing south will provide heat. A passive house would be self-sufficient.	The SPD cannot set policy to require solar panels which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
27 Bargate Homes	<p>A renewable energy generation calculation target of 120kWh / year per sqm is set by the SPD. This is a calculation of the renewable energy that will be generated on-site, in total, per building and per sqm of building development footprint.</p> <p>The figures produced are then expressed as a percentage of the best practice target of 120 kWhm<sup>2</sup>/year, and as a percentage of the building operational energy use (EUI) calculated for the CCS. If the onsite renewable energy generated is below the predicted annual regulated operational energy use, there needs to be a justification that the best practicable outcome has been achieved for the development proposed.</p> <p>This approach is supported and allows room for good outcomes which may not quite meet the targets prescribed in the SPD, so long as they are justified.</p> <p>One additional item to consider is the relationship between maximising dwelling sustainability and high-quality urban design. The Council's ambitions</p>	<p>Comment noted and support welcomed.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement. The National Model Design Code</p>



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	for both good design and climate improvements should not contradict. For example, if the guidance set out in this SPD forces houses to be designed to a certain orientation to ensure energy efficiency targets are reached, this could make for a contrived street scene which conflicts with the strong design focus that the Council also pursue. Allowance within the SPD for such 'overlaps' should be acknowledged.	recognises the environmental performance of place and buildings to ensure they contribute to net zero targets as part of the baseline standard of quality and practice. SPD to be amended to clarify this point.
30 Stoford Developments Ltd	In respect of requirement 2 'On-site renewable energy generation', Stoford include on-site renewable energy through the use of PV panels to the roof of our buildings. The roof is the prime location for the panels, as you already have the structure in place, second tier locations would be the car parks, but you have to build the support frames over the car spaces, which in turn increases the overall carbon. As standard we provide an area of PV panels to generate sufficient electricity to power the to the baseline operational energy demand for the base build, this system is battery enabled to allow for energy storage. The user of the building can then add additional PV panels and batteries to suit their operational energy demands. It is important to note, that it isn't possible for the on-site renewable generation to match the actual total electric use, unless you have fields of PV. In time as the grid decarbonises, and the user chooses renewable energy tariffs the building will be truly net zero carbon in operation.	Comment noted.
31 Persimmon Homes	See earlier comments. Who checks it is installed, who checks it is working and producing the predicted energy savings and who checks to see if it is in place and working for the lifetime of the development?	It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way.
34 New Forest Friends of the Earth	If PV installation is possible, the developer should be mandated to provide a minimum. It will then be easier for the buyer to add further panels at a discounted price (which should be quantified) as the inverter and connections to the grid will already be in place when the house is first being wired. All new homes should have PV installed on their roofs, no matter what the orientation. There are many hours of solar gain east facing in the morning as well as west facing the rest of the day. These can then provide energy for heat pumps (where appropriate) and Mechanical Ventilation with Heat Recovery (MVHR).	The SPD cannot set policy to require PV installation which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>This SPD makes no mention of energy storage using lithium ion cells, which is rapidly reducing in price on the back of the burgeoning electric car industry. NFFoE supports energy storage as it can even out the energy peaks particular at the winter evening times when the most environmentally coal and gas generation is required. For any new PV installation the developer should also offer energy storage systems at a quantified discounted price.</p> <p>No mention of energy storage (lithium ion cells) to store excess solar power generated during the day.</p>	<p>The toolkit refers to ‘smart controls and demand flexibility’, ‘intuitive &amp; flexible energy use’ and ‘energy storage’ rather than batteries. Add text at new para 92 to refer to this.</p>
35 Ringwood Town Council	<p>Where a building cannot be made zero carbon in operation on site, consideration should be given to off-site alternative options. For example, fitting solar panels or heat pump technology to a community building. As a last resort, it could be a Grampian-type condition. ‘Future proofing’ need not apply.</p>	<p>The need for off-site options is likely to be relatively rare and the preference will be for on-site solutions. Whilst developers could propose an off-site option, the Council does not wish to specifically encourage this option and could not require it under current local plan policy.</p>
39 Fiddlesticks Farm	<p>The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.</p>	<p>Comment noted.</p>
41 L Everitt	<p>Every public building should have facilities to create enough of its own electricity. What level of the renewable energy generated should residents expect to be able to return to the national grid?</p>	<p>This will vary from property to property, based on factors including the amount and unit efficiency of PV or other renewable installation, property aspect to the sun, and the level of consumption in the home including whether and how often the occupants charge an EV.</p>
42 P Stickley	<p>What is NOT entrenched is the entirely wasteful and energy-intensive - and therefore by implication, un-green - way in which developers at any level assume that when they connect 150 houses to the mains gas, electricity, BT lines, drainage, and water supply, that no other building or people nearby will be adversely affected by the quality of the service to which they have become used, and will be unlikely to be able to recall in the future. The invasive nature</p>	<p>Comment noted – the matters raised appear to be beyond the scope of this SPD and the change being requested is not clear.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>of all of these services in the areas of highways being fitted with trenches - which ALWAYS seems to go on as everything else and everyone else wants to use THAT road - is such that they use huge amounts of energy, normally consuming hydro-carbons and emitting CO2 in huge volumes; there is the added hazard of in-situ refuelling as well. All of this is undertaken at great speed to keep the cost down - but who measures the Enviro-cost? Such operations are often and normally undertaken AFTER the building of houses has started, and causes considerable inconvenience for existing home owners in the area in a huge number of ways.</p>	
<p>44 Cranbourne Chase AONB</p>	<p>This AONB encourages roof mounted PVs for the capture and utilisation of solar energy where there are not Listed Building or Conservation Area issues. We are much less enthusiastic about field scale PVs.</p>	<p>Comment noted.</p>

**Reducing embodied carbon emissions (CCS3)**  
 Q5. What are your views on the proposed interim best practice objective that developers take all practicable steps to reduce carbon embodied in construction processes?

From	Comment	NFDC Response
05 A Ford	There should be legal compulsion for developers to reduce embodied carbon	The SPD cannot set policy to require developers to reduce embodied carbon which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
10 Chapman Lilley Planning	See previous comments - at application stage, the constructor and the construction process is not often known.	Developers should be considering such matters at design stage prior to applying for planning permission. This is being encouraged as best practice and is not a requirement. If the developer does not wish to include information on carbon emissions it cannot be compelled to do so, although it would need to state this in its climate change statement.
11 S Tonkin	Too many exemptions to best practice compliance.	The SPD cannot require developers to deliver best practice, although it can encourage it through the requirement to prepare a climate change statement.
12 B Lord	Absolutely essential and the sooner the better.	Comment noted.
14 A Elliott	I agree with this proposed interim best practice, but this needs to be monitored closely.	Comment noted.
15 L Tonkin	It will be ignored by the developers. Development should be zero carbon, zero energy now.	The SPD cannot set policy to require development to be zero carbon which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
18 D Orme	The most important factor is forcing developers to incorporate excellent insulation, this is more important than carbon reductions per se.	Comment noted – this is covered under CCS1.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

19 New Forest East Constituency Labour Party	This seems reasonable. An emphasis on sourcing from British suppliers and manufacturers would make this easier and accelerate the objective.	Comment noted – use of British suppliers would be relevant to calculation of the transport elements of building material and products. P36 of the draft SPD identifies ‘Use local materials and suppliers’.
20 Bloor Homes Southern	<p>Currently the Building Regulations do not set a specific requirement for embodied carbon. A number of guidance documents including the LETI Design Guide and RIBA 2030 Climate Challenge strategy set out potential embodied carbon targets, however the potential deliverability and viability of tackling embodied carbon is largely unknown at this stage. The London Plan which typically sets out targets ahead of other Local Authority plans currently only requires developers to assess embodied carbon and does not yet set any specific targets.</p> <p>Bloor Homes are exploring the impact of embodied carbon as part of the first step in reducing this impact and we support the Council’s objective for development to assess and reduce embodied carbon where feasible and viable. At this stage we would be cautious about setting specific embodied carbon targets until further information on the feasibility, deliverability and viability of potential targets have been considered.</p>	Comment noted – the SPD does not set targets but asks developers to assess embodied carbon and demonstrate that they are taking active steps to reduce it.
21 R Kent	Meaningless without checks & enforcement. And checks and enforcement won't happen.	This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally.
22 M Humber	It does it go far enough. At the rate proposed NFDC would never reach carbon zero or the government’s targets. Time is of the essence and the policy should be clear and straightforward. Enforce policies with penalties for only doing bits or a little at a time. It should be mandatory and penalties imposed if a post build inspection shows it does not do what they said it would. Time is running out for our planet. The United Nations says it as it is. Let’s get it right for the Forest.	Comment noted – however, the SPD can only supplement existing policy. New policy could only be achieved through a review of the local plan or nationally.
26 Alex Lawton	I think this is a reasonable objective and should help with more responsible use of resources and more long-term approach to design.	Comment noted.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

<p>27 Bargate Homes</p>	<p>Bargate Homes absolutely agree that reducing embodied carbon in design and construction is vital to improving the built environment and reducing the carbon footprint of the housebuilding industry.</p> <p>However, this is largely outside the developers control and effectively a 'Grampian condition' and a potential impediment to development to add to the wider environmental issues currently required. On this basis, we request that the SPD hopefully creates an incentive to fast-track such changes from providers / developers or provide a transitional period to allow new development to still come forward in a timely way (discussed further below).</p> <p>Climate Change Statements are also expected to identify and describe any steps that have been or will be taken to reduce carbon emissions from the construction process up to the point of practical completion. Such assessments would generally be carried out in accordance with RICS guidance on how to calculate the carbon associated with the whole life cycle of the development from inception to demolition. A full assessment would also be carried out on the material selection that includes data on carbon taken to produce the materials, deliver to site, and so on.</p> <p>This will incur considerable costs for developers and applicants, as well as then implementing changes, such as coordinating the changes to the build and potentially changing build products: e.g. higher recycled quants in any concrete, steel, blocks etc.</p>	<p>This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally. The Council is unlikely to be in a position to be able to refuse development if embodied carbon calculations are not included in the climate change statement, however, provision of this information will help assessment of the proposed development against adopted local plan policies STR1 &amp; ENV3.</p>
<p>30 Stoford Developments Ltd</p>	<p>From the design stage we review the construction materials to assess where we can reduce the embodied carbon, targeting the main sources of carbon in construction which are concrete, steel, and building services plant. Common examples of this type of carbon reduction include adding pulverised fuel ash into concrete mix, or sourcing steel with a higher recycled content. Materials are sourced from manufacturers holding Environmental Product Declarations (EPDs) wherever possible to see that they are responsibly manufactured and supplied.</p> <p>Using third party independent assessors (such as PlanetMark) we carry out a whole life carbon assessment (stages A1 to A5). This assessment provides the embodied carbon for the scheme, which can then be offset by purchasing</p>	<p>Comment noted.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	credits from an approved carbon offset scheme. However, these offset credits are open for projects that do not benefit the local community and environment, we and other companies are looking at how the monetary value of the offset credits can instead be funnelled into local schemes that have a direct local benefit, which are easier to monitor (i.e. you can see photo voltaic (pv) panels being erected on the local school, rather than a mango plantation thousands of miles away). This is a more efficient use of the money.	
31 Persimmon Homes	<p>See previous comments - at application stage, the constructor and the construction process is not often known.</p> <p>These requirements place additional burdens upon the applicant with no realistic benefit - and they will not be checked by the LPA during the construction process in any event, and as explained above, upon occupation and over time, the use of the building and curtilage will alter as it is adapted by the occupier.</p>	<p>Developers should be considering such matters at design stage prior to applying for planning permission.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>If the developer does not wish to include information on carbon emissions it cannot be compelled to do so, although it would need to state this in its climate change statement.</p>
33 New Milton TC	This will only be fully measurable if site visits during construction take place specifically to collect information, from all development types. We feel however this is unachievable with current resources as they are, so seems pointless in compelling the developer without potential repercussion.	This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally.
34 New Forest Friends of the Earth	<p>Passivhaus contradicts the embodied carbon criteria because it encourages the use of energy guzzling building methods although good for keeping down operational carbon.</p> <p>Embodied carbon is emitted from energy consumed during construction, including the production and transportation of building materials - processes developers have some ability to control or influence. Thereafter embodied carbon also arises from periodic maintenance and ultimately from building demolition and waste disposal processes (net of any carbon savings from materials that can be recycled and any energy that can be recovered from residual waste).</p> <p>Although the Code for Sustainable Homes was very frustrating for self-builders, as it was a one-size fits all checklist, it gave excellent rules for constructors and all large developments should follow the requirements for low energy construction and transportation.</p>	<p>Comment noted – as the Code for Sustainable Homes is an historical document it would not be appropriate for the SPD to refer to it. The Council considers that the approach outlined in the SPD encourages best practice with respect to embodied carbon without introducing new policy requirements which could only be achieved through a review of the local plan or national policy.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

<p>35 Ringwood Town Council</p>	<p>This is an excellent concept, although very hard to measure accurately. Government models in this area sacrifice accuracy for simplicity. The suggested list of preferred materials is very welcome for small-scale builders of individual dwellings or small developments that are inexperienced in this area. The threshold of developments of 50+ dwellings/1000 sqm GIA seems too high. For housing, the threshold could be 10+ dwellings. For non-domestic builds, as these tend not to be bespoke, crude calculation is relatively facile and methodology is freely available. It is suggested that the threshold is dropped to 250 sqm.</p>	<p>The SPD cannot introduce new policy and is seeking to encourage best practice. All major development is encouraged to reduce embodied carbon but a threshold of 50 dwellings and 1,000 sqm GIA is included where the calculation of embodied carbon is encouraged to be included in the climate change statement. This is to avoid creating an additional burden on smaller developments.</p>
<p>39 Fiddlesticks Farm</p>	<p>The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.</p>	<p>Comment noted.</p>



**Sustainable travel (CCS4)**

Q6. What are your views on the proposed requirements to help encourage more sustainable travel (note: these should be read alongside the general requirements set out in Local Plan policy CCC2: Safe and Sustainable Travel, summarised in Appendix 1).

From	Comment	NFDC Response
09 R Palmer	Agree that ensuring that sufficient, secure bike storage is provided is crucial to increase confidence and convenience for people to cycle more. The same is true for EV charging, for which the majority of people will be able to and want to charge at home - this is the cheapest form of charging a vehicle.	Comment noted.
10 Chapman Lilley Planning	As a regular and keen cyclist - I would not leave my bike in an outside store for both security and practical / maintenance reasons so do not see the point in providing one in a detached / semi / terrace dwelling. Has the LPA assessed the usage of such facilities where provided to see if they are used or valued by the occupants? if not it may be a useful exercise to assess the value of such external provision.	Comment noted, although the draft SPD does not suggest provision in an outside store other than in an illustrative diagram at paragraph 40. Chapman Lilley Planning can propose alternative arrangements should it so wish.
11 S Tonkin	No commitment to improve public transport which, at present, is so poor that it does not meet the needs of the majority of NFDC's residents.	Improving public transport is beyond the scope of the SPD and is outside the control of New Forest District Council and developers in most circumstances.
13 A Witt	In order to reduce car use in a rural area it's vital that adequate provision for alternatives are made. This should include building a network of cycle paths between developments and local services. Where practical this network should be linked (e.g. enabling safe cycling between say Ringwood and Fordinbridge). In addition to active travel there must be a long-term commitment for public transport, perhaps applying to developments over a certain number of dwellings	Comment noted – Hampshire County Council is responsible for transport planning, including walking and cycling and public transport provision. Any new policy for developers to provide for public transport could only be achieved through a review of the local plan or national policies.
15 L Tonkin	The only way to meet this criteria is to make the housing in a settlement for local people only.	Comment noted – although this would be beyond the scope of the planning system.
18 D Orme	Very weak section. Providing adequate infrastructure to enable widespread active travel is vital for sustainability, reducing use of fossil fuels, and improving the health of the New Forest population.	Improving public transport is beyond the scope of the SPD and is outside the control of New Forest District Council and developers in most circumstances.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

<p>19 New Forest East Constituency Labour Party</p>	<p>The BHL document mentions developments should be in areas with good local facilities and services to minimise travel. There appears to be limited information on who is responsible on ensuring this. Is it the developer or the local authority? How would this work with GP mergers and local pharmacy closures for example? This statement lacks a local link to the New Forest.</p>	<p>Location of development is more a matter for the local plan and outside the scope of this SPD which is focused on the detail of the building rather than the principle of development.</p>
<p>20 Bloor Homes Southern</p>	<p>The Building Regulations update in 2022 introduced Part S which sets out electric vehicle charging requirements for new residential and non-residential buildings. In the context of approved national guidance, we would recommend Part 4a is updated as below to take this into account. CCS 4a: Cycle parking and EV charging (all development): At property level provide secure and accessible cycle parking capacity sufficient for the number of occupants/users likely to be present, along with EV charging in line with the requirements of Building Regulations Part S.</p>	<p>The SPD seeks to encourage provision above the minimum requirements of the Building Regulations as best practice. It is not a requirement and if developers wish to provide the minimum that the Building Regulations require this will need to be stated in the climate change statement.</p>
<p>22 M Humber</p>	<p>We should be able to walk or cycle within a twenty minute journey for shopping, banking, schooling and hospitals. We should have more passenger transport (even in rural areas), or Community Transport Schemes. Safe cycling and walking routes should be prioritised.</p>	<p>Comment noted – Hampshire County Council is responsible for transport planning, including walking and cycling and public transport provision.</p>
<p>30 Stoford Developments</p>	<p>In respect of requirement 4. ‘Sustainable travel’ our employment sites include Electric Vehicle (EV) charging points at 10% of all car parking spaces with a further 10% ducted for future expansion. We provide convenient, covered, and secure cycle storage (with integrated green roofs, and insect nesting structures, and external seating/garden/wellbeing areas for relaxation. On our larger sites we have included shower facilities to further encourage people to walk or cycle to work. For each site we also prepare and submit a Travel Plan that sets out measures to reduce the need for people and goods to travel to and from the site and to facilitate and encourage people to travel more sustainably. Our site is located within 1 mile of the north Totton strategic site (ref SS1), which is allocated for a minimum of 1,000 homes and community focal point in the Local Plan 2020. Bloor Homes have secured outline planning permission for the northern part of the allocation and a reserved matters application, pursuant to the outline consent is pending consideration. A further outline planning application for a large proportion of the southern allocation is awaiting determination. As a result of this development site and the wider Totton area a large pool of potential labour and convenience retail</p>	<p>Comments noted – although these would need to be considered through the local plan review and are out of scope for the SPD.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>facilities are / will be within walking / cycling distance of our site, reducing the reliance on the private car. There is a bus stop on the A36, adjacent our site which provides hourly bus services (X7 and X7R) between Salisbury to Southampton via Alderbury, Whiteparish, Wellow or Romsey, Ower, Totton. The location of the site, on junction 2 of the M27, with direct access on to the strategic road network, lends itself to employment uses that would importantly reduce the need for commercial traffic to travel through the rural parts of the district.</p>	
31 Persimmon Homes	<p>Many members of staff are regular and keen cyclists who advise that they would not leave their bikes in an outside store for both security and practical / maintenance reasons, so would question the point in providing one in a detached / semi / terrace dwelling. Has the LPA assessed the usage of such facilities where provided to see if they are used or valued by the occupants? if not, it may be a useful exercise to assess the value of such external provisions.</p>	<p>Comment noted, although the draft SPD does not suggest provision in an outside store other than in an illustrative diagram at paragraph 40. Persimmon Homes can propose alternative arrangements should it so wish.</p>
33 New Milton TC	<p>About right. There are so many other considerations besides Planning to make sustainable travel achievable. Providing cycle-aware driver training in workplaces and beyond, and stopping the ban of electric scooters on South Western Railway are just the start!</p>	<p>Comments noted.</p>
34 New Forest Friends of the Earth	<p>No mention of public transport. Developments must be in easy walking or cycling distance of public transport to provide a frequent and reliable service to popular centres for shopping, work and leisure.</p>	<p>Public transport is referenced in CCS4 where the best practice objective is 'To minimise the need to travel, and to optimise opportunities to travel when needed by active and public transport modes, or by electric vehicle.'. It is likely that transport considerations will be assessed through the Design and Access Statement, Transport Assessment or Travel Plan for the site rather than information in the climate change statement.</p>
35 Ringwood Town Council	<p>What is included is very good. However, it would be possible to strengthen certain aspects. On EV charging, garages and carports could be fitted with PV arrays to offset EV energy usage. A 2kW system could generate the equivalent per year of around 8000 miles in an EV. Owners without an EV could benefit from grid feed-in tariffs.</p>	<p>Comments noted and support welcomed. Renewable energy generation is covered under CCS2. This part of the SPD to be amended to flag the opportunity to install solar PV on garages or car ports.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>Also, large developments (50+ dwellings) should provide open access facilities of, say, 1 charge unit for every 10 dwellings or 1000m2 non-domestic floor area. Note that the Greencore Construction site pictured on p45 has this facility and also an electric vehicle available for residents to book using an online app. It can and is being done elsewhere.</p> <p>Some extra clauses covering public transport would be welcome, such as on-site bus stops with electronic display boards for developments of 50+ dwellings.</p>	<p>Amend SPD to reflect potential to provide visitor facilities on large sites.</p> <p>The provision of public transport infrastructure would be considered under the transport policies of the adopted local plan.</p>
39 Fiddlesticks Farm	<p>The site is in a sustainable and accessible location at the main town of Fordingbridge, helping to reduce the need to travel and promoting modal shift away from the private car.</p>	<p>Comment noted – although a matter for the local plan review and out of scope for this SPD.</p>
41 L Everitt	<p>New homes should show where locations of commutable places to travel to without a car. They should detail cyclable distances such as Romsey, and Southampton.</p>	<p>Willingness to cycle and feasible cycling distances would vary from person to person. Cycle (and walking) accessibility would be considered when sites are allocated for development, and in more detail in planning application transport assessments.</p>
42 Paul Stickley	<p>There is the question of schoolchildren and education generally. There has been much said about the state of schools in this area. People are simply pouring into SW Hampshire, and many young couples are buying new houses. Who can blame them? They can often afford it, the Bank of Mum and Dad gives them a free loan, and Bob's your uncle; they move in. Next, of course, a baby starts to appear. Where will the child be able to attend as a crèche, playschool or primary school? "Sorry folks, the school is full to overflowing and we have a waiting list with over 100 children wanting to start in Year One." Now multiply this factor in the equation by the number of houses about to be built in my home village alone, and you have a situation where across the area, parents are delivering their child/children to schools well outside the centre of habitation, probably passing thousands of other parents doing the same thing, but in the opposite direction. Is this really helping to keep our country GREEN? I do not think so. The school should be of a size and capacity which reflects the size of the village or town, and not be an old building which has multiple built-on extensions which outdo the original size of the school many times, at the expense of green spaces, playing fields, parking areas for staff (if there are any in the first place) and parking for</p>	<p>Comments noted – although beyond the scope of the SPD.</p> <p>Hampshire County Council is responsible for school provision and transport planning, although restricted by national policies around school choices.</p>

	<p>visitors; recreation areas and physical recreation areas which are outside. The lack of parent parking areas in most schools is very noticeable and deplorable, and an indictment of the way in which education sites are, and have been treated over many years. Parking on a roadside near a school is a potentially life-risking activity. It becomes much more dangerous when the mother/father is carrying a second child, or a third. I leave it to your imagination. When the Coroner gets hold of the valid information relating to the cause of death, it would not look very good for the school's care policy for visitors to the school.</p> <p>This cannot be allowed to go on, not here in the New Forest, not here in Hampshire, nowhere in the UK. It is a disgrace and an embarrassment to the residents of the country. With a rapid and continuously increasing population, town planning has become even more important, so that those of us who are lucky enough live here already can have a healthy, wholesome lifestyle, and our children can be educated in places which are not overcrowded, to which they can walk easily.</p>	
--	--	--

**Avoiding overheating (CCS5)**

Q7. What are your views on the proposed best practice objective that developments are designed to enable urban cooling and to reduce overheating risks?

From	Comment	NFDC Response
10 Chapman Lilley Planning	<p>Landscaping and surfacing is almost inevitably changed / altered / removed /replaced by the building occupants - quite often within the first few years of occupation, therefore the additional burden of having to provide a statement as to how this has taken into account heatwave mitigation is not necessary.</p> <p>What is the justification for requiring that Building Regulations requirements for water consumption are exceeded? How are you going to check this?</p>	<p>The Council considers that provision of appropriate landscaping and surfacing is an important factor in avoiding overheating and heatwave mitigation, notwithstanding the lack of control over future alterations by occupants.</p> <p>The New Forest district falls within a wider area of water stress as identified by the Environment Agency. Southern Water is championing Target 100 to support personal consumption reductions to achieve a 100 litres per person per day standard. This can be achieved by more efficient water fittings and appliances, rainwater harvesting and/or grey water recycling. This is something that developers are being encouraged to do to help adapt to climate change but would not currently be a requirement.</p>
11 S Tonkin	No heatwave mitigation for developments of <10 homes.	Whilst mitigation for overheating of individual properties is relevant for smaller scale development it would be more difficult to provide meaningful heatwave mitigation on a smaller site.
13 A Witt	It's vital that street-based cooling such as mature trees are maintained and enhanced. This may require a reduction in on-street parking, creation of low-traffic neighbourhoods, and implementation of one-way systems in towns where it's practical.	Comments noted.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

14 A Elliott	Does not go far enough. I am really pleased to see this included, but retrofitting old homes needs to be taken as people can die from excessive heat in their home. NFDC should undertake a survey of all properties and prioritise mitigations or retrofits from excessive heat urgently. It's all very well applying the best practice objective to new builds, but what about old builds? I also think this should be made statutory.	Comment noted, although retrofitting is beyond the scope of this SPD which relates to the development of new buildings.
15 L Tonkin	Does not stipulate a requirement for the sort of mitigation that would ensure that overheating doesn't happen.	The SPD cannot introduce a policy requirement but can encourage developers to address overheating mitigation in a climate change statement.
20 Bloor Homes Southern	<p>Increasing summer temperatures is a key consideration for new development and Bloor Homes designs buildings to limit the potential for overheating, prioritising passive measures to reduce the risk of overheating. This includes the consideration of how the development layout, landscaping, planting etc can be optimised.</p> <p>The 2022 update of the Building Regulations included the introduction of Part O, overheating which sets out pathways to consider the overheating of buildings, taking into account the impacts of overheating, this includes an assessment option using dynamic thermal modelling. As a minimum all development will be required to design and assess buildings in line with Part O, additional assessment in line with other guidance (GHA) is not considered necessary. In this context we recommend that Part 5b is amended as below.</p> <p>CCS 5b: Overheating (all residential development)</p> <p>For residential development complete overheating assessment in line with Part O of the Building Regulations and reporting on measures included to minimise and reduce overheating risks as part of the design of homes.</p>	The Council is trying to encourage developers to go beyond the basic requirements of the Building Regulations and ensure that overheating is avoided as much as possible through the design and layout of development.
22 M Humber	This Policy should be compulsory.	The Council cannot introduce new policy requirements through an SPD, this can only be achieved through a review of the local plan or national policy, but is trying to encourage developers to go beyond the basic requirements of the Building Regulations and ensure that overheating is avoided as much as possible through the design and layout of development.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

<p>26 Alex Lawton</p>	<p>The proposals seem reasonable from a building design point of view but they do not mention the importance of plants and trees in cooling and shading. I realise this may be indirectly covered by ecology guidelines but is it worth stressing the importance of existing mature trees and newly planted trees in cooling the immediate surroundings?</p>	<p>Comment noted. The SPD currently refers to planting strategies as a best practice objective to avoid overheating and CCS 5b on p24 requests description of how heatwave mitigation has informed the planting and landscaping strategy. The SPD will be amended to reflect the importance of trees and plants in helping to provide heatwave mitigation in the best practice section on p35. N.b. link to Good Homes Alliance Overheating in New Homes checklist at para 85 does not appear to work.</p>
<p>27 Bargate Homes</p>	<p>Bargate Homes are already meeting new requirements within Part O of the Building Regulations 2010 (Overheating) on other sites that they are bringing forward. It's acknowledged that this is an important issue. NFDC's draft SPD also includes the need for an assessment of 'natural heatwave mitigation' in relation to planting and landscaping strategies. The design issue referred to above, regarding the orientation of dwellings, is reiterated*.</p> <p>*(The Council's ambitions for both good design and climate improvements should not contradict. For example, if the guidance set out in this SPD forces houses to be designed to a certain orientation to ensure energy efficiency targets are reached, this could make for a contrived street scene which conflicts with the strong design focus that the Council also pursue. Allowance within the SPD for such 'overlaps' should be acknowledged.)</p>	<p>Comment noted.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement. The National Model Design Code recognises the environmental performance of place and buildings to ensure they contribute to net zero targets as part of the baseline standard of quality and practice. SPD to be amended to clarify this point.</p>
<p>30 Stoford Developments Ltd</p>	<p>In respect of requirement 5. 'Avoiding overheating' we design a highly efficient thermal envelope centred around high levels of insulation, airtightness, solar shading, and glazing selection to reduce heat transmission. This combines to reduce the amount of energy required to heat and cool the buildings.</p> <p>As our plans for the site progress, we will seek to orientate the offices within our development appropriately to prevent overheating. If this is unavoidable, we will plan to incorporate a form of solar shading such as brise soleil to minimise the need for cooling.</p>	<p>Comment noted.</p>



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

31 Persimmon Homes	Landscaping and surfacing is almost inevitably changed / altered / removed /replaced by the building occupants - quite often within the first few years of occupation, therefore the additional burden of having to provide a statement as to how this has taken into account heatwave mitigation is not necessary.	The Council considers that provision of appropriate landscaping and surfacing is an important factor in avoiding overheating and heatwave mitigation, notwithstanding the lack of control over future alterations by occupants.
35 Ringwood Town Council	Very sensible suggestions. The use of the Good Homes Alliance tool is welcome.	Comment noted.
43 Natural England	Point 5 'Avoiding Overheating' is the only part of the CCS that mentions green and blue infrastructure provision, however, this aspect is not well explored within the supporting text within part B or C of the SPD. The Climate Change SPD is the ideal place to emphasise in detail the (multiple) benefits of well-designed GI in combatting climate change, and it should serve as a key local policy driver in encouraging developers to maximise the amount of GI incorporated into development design.	Comment noted – SPD to be amended to include a reference to the Partnership for South Hampshire's Green Infrastructure Strategy and Green Infrastructure Implementation Plan. This guidance is not repeated in the SPD.

**Flood risk reduction and sustainable urban drainage (CCS6)**

Q8. What are your views on the proposed best practice objective to naturally and safely manage surface water run-off, including under extreme climate conditions.

From	Comment	NFDC Response
05 A Ford	Don't build on flood plains or near rivers.	Comment noted – location of development and flood risk policy are matters for the local plan review.
11 S Tonkin	There should not be SUDs exemptions for small developments.	Comment noted – SPD to be amended to encourage SUDS on smaller developments.
12 B Lord	It should be obligatory to construct large volume underground RWC structures/cisterns whenever ground is levelled to replace a building or within any new build site.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the suggested requirement could form part of an approach to SUDS which would prevent flooding and reduce water consumption.
13 A Witt	The requirements around nitrogen and phosphate pollution in local river catchments needs greater focus. Nutrient mitigation schemes should be a last resort as these do little to reduce overall pollution and by effectively "exporting" pollutants - e.g. to the Isle of Wight as per the recent agreement - there is a risk that watercourses close to developments suffer increased pollution and reduced biodiversity	Comment noted although beyond the scope of the SPD.
15 L. Tonkin	Stop building in areas prone to flooding.	Comment noted – location of development and flood risk policy are matters for the local plan review.
17 Southern Water	Whilst not in line with current legislation, Southern Water would encourage a requirement for SuDS features to be included all new development, including both minor as well as major applications. We support any requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This would align with our own work to address problems caused by excess surface water in our sewerage	Any new planning policy requirement would have to be achieved through a review of the local plan or change to national policy. SPD to be amended to encourage SUDS on smaller developments.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>network in order to protect water quality in rivers and sea (more information on the work we are doing is on our webpage <a href="https://www.southernwater.co.uk/our-performance/storm-overflows/clean-rivers-and-seas-task-force">https://www.southernwater.co.uk/our-performance/storm-overflows/clean-rivers-and-seas-task-force</a>).</p> <p>Historically, the sewer network was designed to accommodate both surface water and foul flows in the same pipe (the 'combined' sewer). However in terms of future flood risk, better rainwater management through SuDS is the preferred approach to avoid problems associated with mixing surface water with wastewater and placing added pressure on drainage networks during heavy rainfall, helping to mitigate flood risk as well as 'combined storm overflow' (CSO) use. Unless or until Schedule 3 of the Flood and Water Management Act 2010 is enacted, we must accept new applications to connect surface water to the combined network as a last resort, in accordance with Building Regulations part H drainage hierarchy.</p> <p>DEFRA's recently published Storm Overflows Discharge Reduction Plan sets an expectation on water companies "to achieve year on year reductions in the amount of surface water that is connected to their combined sewer network [...] This should include limiting any new connections of surface water to the combined sewer network". Therefore, whilst Southern Water supports the intent of CCS6, we would also recommend a stronger requirement that minor as well as major development should include SuDS features, to avoid placing added pressure on the sewer network during wet weather.</p>	
18 D Orme	The planning system should prevent building on flood plains and should force all new driveways to be drain to soakaways or be permeable.	Comment noted – location of development and flood risk policy are matters for the local plan review.
19 New Forest East Constituency Labour Party	There is a need for developers to work closely with Southern Water to ensure the mains supply/sewage system is fit for purpose in the new development. eg the state and age of the pipes, the future capacity, leaks etc.	Developers have to formally engage with Southern Water on water supply and wastewater conveyance and treatment.
20 Bloor Homes Southern	Bloor Homes supports the use of SuDS and providing naturalised drainage mechanisms and these are incorporated into all of our schemes. All development proposals consider the potential for flood risk in line with	Comment noted.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	national guidance which sets out climate change allowances for flood risk. In this context sustainable drainage systems are designed to take into account extreme weather events, including an uplift for climate change.	
22 M Humber	Very good if it works but if not houses built on a stilt design with garages underneath.	Comment noted.
25 T Phillips	It is critical that any development can at the very least entirely mitigate the issues it creates in terms of flood risk. This ties into CCS7 and rainwater harvesting. In terms of flood prevention a rainwater tank capable of holding an entire heavy downpour should be mandated for all new developments and any significant planning permissions where it is practicable to add the tankage in at relatively little cost. This is SO important because it not only negates any flood risk (the tank can discharge over hours/days and has done its job mitigating flood if not harnessed up to be used by the dwelling) but also has a significant impact on mitigating Nitrate discharge as it is the flooding of sewerage that creates the most nitrate discharge from housing. The current tactic of looking to changes in farming to address the housing Nitrates issue is non-sensical at scale; housing must address housing derived nitrate discharge and farming must address farming related discharge. Holding potential floodwater back to prevent that volume of sewerage overflow is a direct saving and therefore tankage in every new development has the potential to sort this. Shallow dig 10,000L tanks are easily available and economical BUT only if done at the time of construction (new build or significant extension). This is where mandatory tankage is vital – retrofitting would require motivated homeowners or grants.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the suggested requirement could form part of an approach to SUDS which would prevent flooding and reduce water consumption.
30 Stoford Developments Ltd	In respect of requirements 6. 'Flood risk reduction and sustainable urban drainage (SuDs)' and 7. 'Drought resilience and using water efficiently', we always seek to incorporate Sustainable drainage systems (SuDS) and other naturalised drainage mechanisms wherever they are capable of being effective. By way of example this has taken the form of attenuation basins, roadside swales, permeable paving and / or land drains. We also incorporate rainwater harvesting systems to provide water for flushing toilets and reduce water consumption.  The other key aspect we consider on all our schemes is green infrastructure. On our larger multi-unit sites there is more opportunity to	Comment noted.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	create new wildlife habitats, such as wet land areas integrated into the SuDS systems, insect hibernacula, swift towers, and greater variety of species mix through new hedgerows and managed grassland planting.	
31 Persimmon Homes	These will obviously vary from site to site as ground conditions and options to dispose of the water will vary. We would hope that the LPA will take into account cost and the sometimes excessive land take which is required to provide such systems which may mean the housing numbers on the site may not be as envisaged or / and that greater density of development may be required in order to achieve an economic return.	Comment noted.
35 Ringwood Town Council	Commenting on SUDs design is outside our expertise area. Pointing to the latest NPPG sounds prudent.	Comment noted.
39 Fiddlesticks Farm	The site is outside of any area of flood risk and can positively address surface water drainage through a SuDS strategy, which has already been prepared and is factored into our concept layout. This will be of benefit both to the site and offsite downstream into the catchment below.	Comment noted – although a matter for the local plan review and out of scope for this SPD.
41 L Everitt	SUDS should be last resort.	The adopted local plan sets out that SUDs will be sought wherever they would be effective in reducing the risks of flooding (policy ENV3).
43 Natural England	<p>Regarding SuDS, it is important to note that these will form a mandatory requirement for most new development in England, under Schedule 3 to the Flood and Water Management Act 2010, expected in 2024. It is recommended the SPD reflects this. We agree that SuDS should be designed to CIRIA standards.</p> <p>It is noted CCS 6b part ii refers to nutrient reduction measures. Is this intended as a specific climate adaptation measure for development to address? We agree that the impacts of increased nutrients on habitats and species may be exacerbated by the effects of climate change and that SuDS can perform an important role in treating the quality of surface runoff water. Developments may be required to demonstrate nutrient neutrality to address impacts on protected sites where they are likely to have an effect without mitigation.</p> <p>We recommend that further measures for the natural environment are included within the SPD to help habitats and species (and ultimately the</p>	<p>Comment noted – SPD to be amended to remove the reference for SUDS only being required for major development.</p> <p>Comment noted – the SPD has been amended to refer to potential requirement for nutrient neutrality although guidance is liable to change and not repeated in SPD.</p> <p>The suggested additions would be more appropriate for inclusion in the forthcoming Biodiversity SPD and do not need to be</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>human population that relies on healthy ecosystems) adapt to a warming climate, including maximised provision of habitat and/or contributions to local strategic conservation schemes, and sympathetic management of greenspaces that provides a variety of sward heights and habitat types and space for wildlife to find shelter/refuge, particularly during the growing season.</p>	<p>repeated in this document. The Local Nature Recovery Strategy may also be relevant.</p>
--	---	--

**Drought resilience and using water efficiently (CCS7)**

Q9. What are your views on the proposed best practice objective to use mains and surface water more efficiently to improve drought resilience.

<b>From</b>	<b>Comment</b>	<b>NFDC Response</b>
07 Wings Wildlife Heritage	Every new property should be automatically fitted with a means of storing and re-use of 'grey water' for gardens, washing cars etc.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags grey water recycling as best practice.
10 Chapman Lilley Planning	Water consumption should be left to Building Regulations.	Comment noted. It is legitimate for planning policy to address water consumption. There is no requirement for standards more progressive than Building Regulations in the SPD although Target 100 is identified as best practice.
11 S Tonkin	Too much "could" and "should"; not enough "must".	Comment noted. The SPD can only supplement adopted local plan policies. Introducing new policy requirements currently beyond local or national policy can only be achieved through the local plan review or change to national policy.
12 B Lord	RWC and Grey Water re-cycling should be obligatory where ground is levelled for building replacement or in every new build large or small. Take the pressure off natural groundwater aquifers or riverine habitats at the earliest opportunity.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
17 Southern Water	Whilst Southern Water would prefer to see higher water efficiency standards mandated in all new development (in line with our T100 program, mentioned in paragraph 113), we appreciate this goes beyond current legislative	Comment noted. However, it should be noted that 'reducing mains water demand' is an information requirement and the Council

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>requirements. We are supportive of the measures set out in paragraphs 110-118, as well as the requirement for a reduction in mains water use in both major and minor new development (Table 1, page 16). These measures will contribute to sustainable development by helping to reduce demands on natural resources, and should help to reduce consumption to below the current legislative standard.</p>	<p>cannot compel developers to achieve standards beyond the higher Building Regulations standard.</p>
<p>19 New Forest East Constituency Labour Party</p>	<p>There is a need for developers to work closely with Southern Water to ensure the mains supply/sewage system is fit for purpose in the new development. eg the state and age of the pipes, the future capacity, leaks etc.</p>	<p>Developers have to formally engage with Southern Water on water supply and wastewater conveyance and treatment.</p>
<p>20 Bloor Homes Southern</p>	<p>Part G of the Building Regulations sets out water efficiency requirements for new dwellings, including standard and enhanced water consumption rates of 125 litres per person per day and 110 litres per person per day. Bloor Homes supports the delivery of water efficient homes, and all homes are built to the Government's higher water efficiency standard of 110l/p/d and additionally, where feasible, all homes are provided with water butts to enable homeowners to make use of rainwater to water gardens. Furthermore as part of landscaping and planting in new developments we make use of climate tolerant species to minimise the impact of changing climate space, including reduced summer water availability on habitats and species. Any further targets for reducing water consumption should be set out in line with the Building Regulations.</p>	<p>Comment noted. It is legitimate for planning policy to address water consumption. There is no requirement for standards more progressive than Building Regulations in the SPD although Target 100 is identified as best practice.</p>
<p>22 M Humber</p>	<p>Policy is very good. However all water should be reused. Rainwater used for toilets and washing machines then the heat passing through a heat exchanger. No power showers and bath water recycled extracting the heat. All buildings to have water meters.</p>	<p>The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p>
<p>24 M Smith</p>	<p>Beef up the grey water usage requirements</p>	<p>The SPD can only supplement adopted local plan policies. More stringent grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to</p>



ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		national policy. However, the SPD flags grey water recycling as best practice.
25 T Phillips	<p>Rainwater harvesting needs to be mandatory and not optional at the point of grant of permission. Not only does it significantly reduce flood risk (see comments on CCS6) but can contribute heavily to water usage savings. The economics however are compelling at the time of construction (new build or significant extension etc) but often hard to justify as a retrofit for anyone but the most environmentally motivated. The combination of installing shallow dig rainwater harvesting tanks at the construction stage that can a) prevent flooding b) prevent nitrate discharge into waterways AND c) save water usage with all the benefits to preservation of resource and related biodiversity is both vital and economically very good value.</p> <p>One quick correction – paragraph 115 states that the annual water falling on a 60sqm roof would be 5,000 litres. I think it would be closer to 50,000 litres</p>	<p>Comment noted. The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p> <p>Agreed – SPD to be amended accordingly.</p>
26 Alex Lawton	<p>Does not go far enough, I think water butts should be used only as an alternative were larger rainwater harvesting tanks or grey water recycling are unsuitable. Water butts (unless several are joined together) do not provide sufficient water to last many(most?) gardens through the extended dry spells which are occurring more regularly.</p>	<p>The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p>
30 Stoford Developments Ltd	<p>We always seek to incorporate Sustainable drainage systems (SuDS) and other naturalised drainage systems wherever they are capable of being effective. This has taken the form of attenuation basins, roadside swales, permeable paving and / or land drains. We also incorporate rainwater harvesting systems to provide water for flushing toilets and reduce water consumption.</p> <p>The vast majority of our site is located outside of the Flood Zone with the exception of a swathe across the northern boundary which follows the route of the Cadnam River. We will plan to locate our buildings outside of the flood zone and incorporate SuDS as appropriate to avoid increased vulnerability to</p>	<p>Comment noted although not a matter for this SPD.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	flooding. We will integrate green infrastructure and maximise the opportunities to increase biodiversity.	
31 Persimmon Homes	Where practicable and does not require significant cost implications, this may be achievable.	Comment noted.
33 New Milton TC	Does not go far enough. Water butts for grey water use with essential messaging about greatly diluted product use, would also be helpful to allow watering of vegetable gardens. This is essential for all dwellings as many attempt to save money/eat more cleanly rather than buying from supermarkets.	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
35 Ringwood Town Council	This area could be strengthened. Using drinking water for flushing toilets, albeit a reduced amount by limiting cistern size constraints, is frankly daft. The 110L standard is a blunt tool. Better would be greywater recycling and rainwater harvesting, as suggested, with underground tanks acting as mini-SUDs. The Crest-Nicholson site near Bicester has incorporated this technology and it was not cost prohibitive. Water bills (and therefore wastewater bills) are lower, although this is offset to a degree if the owner pays for the tanks to be cleaned periodically. It also reduces the phosphate load to the sewage system (drinking water is dosed with orthophosphoric acid). Fitting tanks under driveways works well. On sizing, we are unaware of any guidance on this, so a rainwater tank of 1 m3 per square metre of roof area minimum is suggested.	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
39 Fiddlesticks Farm	The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.	Comment noted although not a matter for this SPD.
41 L Everitt	Every public building should collect enough water to flush its WC's. What level of mains water consumption should residents expect?	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		<p>policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p> <p>The baseline standard for residents is 110 litres per person per day, and lower usage is encouraged</p>
41 L Everitt	Further details are required as to water runoff from waterbutts and roofs.	Some additional detail is provided at para 115 (p.40).
42 P Stickley	<p>Let us look at just one of the services which are used by 99% or more households: water supply. In the last fifteen years, we have enjoyed a very reliable supply, with zero hosepipe bans in the summer periods, and the water has proved to be palatable and clear - apart from the occasional yellow tinge which appears about 48 hours after a downpour. We don't worry about such things. Mother Nature is at work. What really irritates me is that the threatened construction of around 250 houses in this vicinity looks as if it will have a wholly detrimental effect upon the water pressure in this area...and anyone who denies this is wholly in cloud cuckoo land, or very much better educated than me in the area of water pressure. So, to continue the thread of ideas (mine, and nothing very creative), why do we have to tolerate being treated to low to negligible water pressure, when the developers should be required to check and publicise the results of their investigations BEFORE a single brick is laid? Isn't this an obvious route to go, rather than make themselves very unpopular amongst the local existing population...to the point of hatred?</p> <p>Much of this trouble is fed by greed. The developers, not known for having a policy about how to look after the immediate surroundings of the site, want to get the first few houses built and sold, so that they can repay the bank from whom they have borrowed to undertake the development. Ignore everything and everyone, just do it, and we'll solve the problems with water pressure, poor drainage, negligible internet speed, negligible gas pressure, poor telephone lines, spaces in schools...and poor building quality possibly, at a later date.</p>	<p>Comments noted. Developers and water companies have to work within the existing legislative and local and national policy context. The plan-led system is key to providing infrastructure to support new development.</p>
43 Natural England	Southern Water's Water Resources Management Plan (WRMP) 2019, that covers the planning period 2020-2070, projects a significant supply demand	

	<p>deficit during periods of drought in the Western Area, and commits to implementing a long term water resources scheme to restore the supply demand balance whilst avoiding and/or mitigating impacts on protected sites. It is Natural England’s advice that in advance of any permitting of such a suitable long term scheme, uncertainty remains with regards to water resources and the impacts of abstraction on protected sites.</p> <p>CCS7 is about reducing mains water consumption. It is helpful that the SPD sets out water efficiency standards from the Buildings Regs and Southern Water. However we consider the SPD should go further in setting the standards as requirements. We recommend all new development within the Southern Water supply area adopt the higher standard of water efficiency of 100 litres/per person/day, in line with Southern Water’s Target 100 demand reduction programme. For other water supply areas we recommend water consumption for new dwellings of no more than 110 litres per person per day in line with the higher Building Regulations standard. Further water efficiency uses beyond this would be welcomed.</p> <p>We welcome the encouragement of rainwater harvesting and greywater recycling facilities in new development.</p>	<p>Comment noted. However, the SPD can only supplement adopted local plan policies. Introducing new policy requirements currently beyond local or national policy can only be achieved through the local plan review or change to national policy. Reduced water consumption is flagged as best practice.</p>
--	---	---

**Any other matters**

Q10. Do you have any other comments on the Climate Change SPD? Specify the paragraph number(s) that you are commenting on wherever applicable.

From	About	Comment	NFDC Response
07 Wings Wildlife Heritage		Not enough attention is being paid to biodiversity enhancements. All developments (of any size) should have conditions included within the approval that certain enhancements that would benefit our declining birds and wildlife.	A separate biodiversity SPD is being prepared that will cover these types of issues.
10 Chapman Lilley Planning		<p>In summary, to reiterate, whilst the aims and objectives are laudable, the planning system neither has the resources or the legislation to enable the implementation of the SPD.</p> <p>If you are going to require a suite of reports and documents please make this expressly clear at the front of any document - so far I note the requirement for a CLIMATE CHANGE STATEMENT, a BRE ASSESSMENT, GOOD HOMES OVERHEATING RISK TOOL, CARBON EMISSIONS CALCULATIONS, BUILDING FOR A HEALTHY LIFE ASSESSMENT, RENEWABLE ENERGY CALCULATION, FUTURE PROOFING STATEMENT, SMART ENERGY SYSTEMS.</p>	<p>The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. The SPD will assist with the implementation of adopted local plan policies STR1 &amp; ENV3. The proposed Climate Change Statement brings information generally already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. In order to facilitate the provision of consistent information a proforma has been added to the SPD.</p>
11 S Tonkin	11, 16, 51 (and others):	11, 16, 51 (and others):	A separate Biodiversity SPD is being prepared and this would be the

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		<p>Comments here and in the Separate Companion Document on reducing lighting in order to reduce energy use are welcome, as is the net zero carbon aspiration, but this lacks joined-up thinking and, therefore an open goal is being missed, i.e.mitigating climate change by preserving/enhancing the carbon sequestration provided by photosynthesisers. Given the growing evidence (links provided) of the harm caused to flora by artificial light at night (ALAN), measures to control ALAN would complement other measures to mitigate climate change.</p> <p>Incidentally, such measures would, of course, also have beneficial effects on biodiversity, in line with the "Nature" bit of the "Climate and Nature Emergency"&gt;</p> <p>Sample evidence for harm to flora caused by ALAN:  <a href="https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2745.12551">https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2745.12551</a>  <a href="https://www.nature.com/articles/d41586-018-00665-7">https://www.nature.com/articles/d41586-018-00665-7</a>  <a href="https://cescos.fau.edu/observatory/lightpol-Plants.html">https://cescos.fau.edu/observatory/lightpol-Plants.html</a>  <a href="https://www.extension.purdue.edu/extmedia/fnr/fnr-faq-17.pdf">https://www.extension.purdue.edu/extmedia/fnr/fnr-faq-17.pdf</a>  <a href="https://www.researchgate.net">https://www.researchgate.net</a></p>	<p>appropriate document to address this issue.</p>
13 A Witt	Paras 119 & 120.	<p>The document indicates in Figure 3 ecology and biodiversity requirements. I note that further guidance will be coming on this but there are also impacts on flood risk and overheating to consider which should be noted in this proposed regulation.</p> <p>For example, use of artificial grass and large paved/decked areas reduces the ability of properties to pass rainwater into the water table, creating runoff impacting other areas. Furthermore, such landscape treatments contribute to overheating. There is a win-win-win opportunity here by mandating planting regimes which require natural grass, water features, native tree cover, etc. As per current permitted development rules a requirement that non-natural features are limited to a proportion of the plot size would be appropriate. Maximising natural features provides habitats which can be further enhanced with wildlife corridors - e.g. use of natural hedges rather than fencing, provision of gaps in fencing - and also building features such as nest boxes and swift bricks etc.</p>	<p>Developers will be encouraged to address planting and landscaping in relation to climate change under CCS5a and hard landscaping under CCS6.</p> <p>A separate biodiversity SPD is being prepared that will cover these types of issues.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

15 L Tonkin	General	Net zero housing should have been required years ago, this SPD is too little too late.	Comment noted. The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets, and these could only be achieved through the local plan review or a change in national policy.
19 New Forest East Constituency Labour Party		Does NFDC have any more ambitious plans for mitigating against Climate Change than the Government's targets? Is it possible to add some more tangible requirements to local plan policy ENV3?	This is a matter for the local plan review.
22 M Humber		Climate change is happening now. June 2023 was the hottest on record since 1940 and before. Be bold not cautious.	Comment noted.
26 Alex Lawton	Part B Table 1.	I am not sure that opt outs should be available for smaller developments. Most of the developments I have been aware of in the local area (waterside) are small and could therefore be built to lower standards. Many of these are above average size/price houses for which the additional costs of complying with best practice would be a small proportion of the total price.	The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments.
26 Alex Lawton	Part C para120	(referring to Ecology and BNG Interim Advice Note P9-10). I think building enhancements should be provided wherever suitable (rather than at least one as in the guidance note). Hedgehog gaps in fencing, swift bricks, invertebrate bricks, bird boxes can all be provided at very low cost when constructing buildings. These will help improve habitat for animals in the built environment but may help residents to consider and appreciate these creatures more.	Comment noted. A separate biodiversity SPD is being prepared and this would be the appropriate document to address these issues.
27 Bargate Homes	57,61,(CCS1c,CCS2b):	Having consulted with Briary Energy, we understand that many of the standards within the SPD are established by LETI guidance. It is considered important that the SPD is clear in how it sets its EUI and space heating demand calculations.	

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		<p>Building Regulations 2010 Approved Document L modelling (and its Standard Assessment Procedure (SAP)) is essentially the national compliance tool for calculating the energy performance of dwellings and underpins the Energy Performance Certificate (EPC) of new homes.</p> <p>Overall, many of the standards expected by the DRAFT SPD are a 10% improvement over Approved Document L, which is not – in and of itself – objected to. However, Part L is a nationally understood, easily auditable and accessible tool for driving better energy efficiency and renewables in housebuilding. Bargate Homes would therefore seek further clarity from the SPD as to which metrics (how) such exceedances of national energy efficiency standards are to be reported by developers and applicants in Climate Change Statements and other material.</p> <p>In addition, clarity is sought as to how (or by whom) such calculations shall be reviewed and assessed by the Council, as this is a technical exercise involving specialist knowledge and expertise.</p>	<p>Further guidance to be provided in a proforma</p> <p>The Council will work from the basis that calculations provided are correct and will review a sample of calculations. Planning officers will undergo appropriate training.</p>
27 Bargate Homes	General	<p>The SPD does not provide any ‘transitional arrangements’ upon adoption of the SPD, which raises concerns as to potentially difficult requirements needing to be met for planning applications which are already well advanced and policy compliant. It is requested that such arrangements are made within the SPD for applications which otherwise accord with the adopted development plan.</p> <p>The above is suggested, largely because of the approach to be taken in the adoption of optional or ‘additional’ (over and above national standards, which this DRAFT SPD endorses) standards. The Planning Practice Guidance acknowledges (para 12 6-012-20190315) that ‘local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building</p>	<p>It is intended that the SPD gives further explanation as the implementation of adopted local plan policies STR1 &amp; ENV3. The SPD introduces the requirement for applicants to submit a climate change statement where the applicant can provide information to assist with the assessment of whether the proposed development complies with policies STR1 &amp; ENV3. The SPD does not introduce new policy requirements which could only be achieved through the review of the local plan or change to national policy.</p>



	<p>regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes.’ [Pegasus emphasis added].</p> <p>However, the PPG is also clear that this is allowed for by the Planning and Energy Act 2008, which itself ‘allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations’ (PPG para 012 6-012-20190315) [Pegasus emphasis added].</p> <p>GOV.UK advice also confirms that:          ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan.’ (PPG para 008 Reference ID: 61-008-20190315) [Pegasus emphasis added].</p> <p>As such, the introduction of new ‘standards’ via this SPD mustn’t be confused with the introduction of new policy, which can only be achieved via the adoption of Local Plans. The only policy compliant and sound approach the Council can take to the adoption of the optional technical standards is through a focussed review of the Local Plan. Only this approach would provide the necessary opportunity for the evidence to be thoroughly tested and scrutinised by stakeholders and a Planning Inspector.</p> <p>As such, it is considered that further nuance is required in the advocacy of standards within the SPD. The introduction of optional (and endorsed) standards over and above the Building Regulations to improve the sustainability of new development is noted by Bargate Homes. However, the SPD is currently drafted as to suggest that the standards being endorsed will be assessed in a ‘policy compliance’ way, against STR1 (vi) of the NFDC Local Plan 2016-2036 (Part 1). This does not accord with PPG or The Town</p>	
--	---	--

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		and Country Planning Regulations 2012, both of which confirm that SPDs and Local Development Documents are not local plans and cannot – in and of themselves – introduce new planning policy.	
29 Historic England	Additional section D on retrofitting	<p>Add a short, new section D in the SPD on retrofitting, supporting the role of heritage as part of the climate solution (as stated in Historic England’s <a href="#">climate strategy</a>): summarising the challenges, emphasising the need for sensitivity and expert advice when retrofitting historic buildings taking a whole-building approach, and signposting other relevant guidance.</p> <p>Add a reference to policy DM1 on heritage and conservation in Appendix 1. Relevant HE guidance links provided in the HE representation</p>	The focus of the SPD is on new buildings and masterplanning new development. However, it would be helpful to signpost the Historic England guidance in the SPD and to clarify that the SPD only covers new buildings.
29 Historic England	Para 31	A ‘fabric first’ approach is not suitable for traditionally-constructed buildings.	Footnote added to this effect
29 Historic England	Paras 31 41, headings for Part C and subheadings preceding paras 67 and 72	Clarify that Figure 4 planning application requirements are for new development only, additional factors need to be considered when retrofitting traditionally constructed buildings. Amend headings to clarify guidance refers to new build development.	Agreed – clarification that guidance will refer to new build development will be added.
29 Historic England	56	Encourage the Council to recognise the important role of occupant behaviour on a building’s carbon emissions	Comment noted, but these are general principles for buildings from the NZCT.
31 Persimmon Homes	General	<p>In summary, to reiterate, whilst the aims and objectives are laudable, the planning system neither has the resources or the legislation to enable the full and realistic implementation of the SPD or to measure its ongoing effectiveness.</p> <p>If you the Council will require a suite of reports and documents, please make this expressly clear at the front of any guidance document – The SPD weaves numerous requirements in the text – effectively hidden – but so far we note the requirement for most planning applications for residential development will include; (1) CLIMATE CHANGE STATEMENT, (2) a BRE ASSESSMENT, (3) a GOOD HOMES OVERHEATING RISK TOOL, (4) CARBON</p>	The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. The SPD will assist with the

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		<p>EMISSIONS CALCULATIONS, (5) BUILDING FOR A HEALTHY LIFE ASSESSMENT, (6) RENEWABLE ENERGY CALCULATION, (7) FUTURE PROOFING STATEMENT, and (8) a SMART ENERGY SYSTEMS.</p> <p>We cannot help conclude this is excessive and will not in any event be understood or meaningfully checked or assessed by the case officer, who with respect, is likely to be already overburdened with both workload and the ever increasingly complex nature of development management.</p> <p>The SPD is incredibly wordy and long. We would suggest / recommend, like several other LPAs have done, you try and make it simpler for applicants, by producing a simple check list and spread sheet which can be completed 'on line' and submitted with the application in order to speed up and pass validation process.</p>	<p>implementation of adopted local plan policies STR1 &amp; ENV3.</p> <p>The proposed Climate Change Statement brings information generally already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document.</p> <p>The Council will work from the basis that calculations provided are correct and will review a sample of calculations. Planning officers will undergo appropriate training.</p> <p>The SPD references best practice examples which contributes to its length. In order to facilitate the provision of consistent information a proforma has been added to the SPD.</p>
33 New Milton TC		<p>Surprise that Manufactured Modular Construction is not mentioned, which uses no concrete, factories of which can produce one house per hour with construction taking one week per house e.g. current project in Ashford, Kent.</p>	<p>Part C of the SPD has been amended to include a reference to modern methods of construction in relation to embodied carbon.</p>
34 New Forest Friends of the Earth	Para 57	<p>MVHR is required if we go with well insulated homes.</p>	<p>The SPD cannot introduce a requirement for Mechanical Ventilation Heat Recovery but information as to whether it is proposed as part of the development is sought under CCS5c.</p>
35 Ringwood	General	<p>Implementation of this SPD will require a substantial training programme for Planning Officers, Members, etc. in order to embed an understanding of the issues and the SPD requirements.</p>	<p>Comment noted. It is intended that training will be provided.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

Town Council			
37 Hordle PC	69	The emphasis on form efficient design may compromise the character of the area and street scene.	Efficient form does not mean poor or inappropriate design. The SPD would not override relevant planning policy guidance on design and character, including Local Plan policies ENV3-4. Applicants will need to articulate any potential conflict in the Design and Access Statement and/or the Climate Change Statement.
42 P Stickley	General	The most frustrating part of all this is that everyone KNOWS that it is entirely logical to lay the main services BEFORE building starts , and to ensure that adequate supplies or services are all at pressure and ready to start. We all KNOW that a building company wanting to build a huge number of domestic residences in a village will be the driving force behind many people objecting to the plans, and at the same time requiring more services IN the village - shops, a medical centre, a pharmacy, a larger or additional school, and so on. Everyone KNOWS that more recreational space will be needed, as will parking areas and spaces, and also places of worship. However, these things are never managed properly, and they get forgotten very easily, and then are squeezed into the blank spaces in the urban sprawl - not necessarily where they are needed, but anywhere they can be fitted. This must all sound and look very familiar to urban planners...but are the urban planners able to change the thinking which is required to make it happen? Apparently not. All too often good houses are demolished to make way for car parks; playing fields are used up by school expansion, and so on.	Comment noted – the plan-led system is key to providing infrastructure to support new development. These comments would be more appropriately addressed through the local plan review rather than this SPD.
43 Natural England	General	Nature-based solutions' (NBS) are an essential tool to achieve climate mitigation and adaptation. They involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include expansion of tree and woodland cover; restoration and creation of priority habitats; natural floodplain	Text on nature-based solutions added and link to Natural England's report added.

		<p>management/ retrofitting of green infrastructure (GI) including sustainable urban drainage systems (SuDS). NBS can address multiple issues simultaneously, e.g. flood risk, air and water equality, biodiversity, and health and wellbeing of people.</p> <p>We welcome the final section of the SPD that focuses on supporting ecology and biodiversity, however we consider the SPD can be much stronger and more specific throughout, in requiring developers to design in nature-based solutions into their developments.</p>	
43 Natural England	General	<p>We would refer you to the Green Infrastructure Planning and Design Guide (Natural England, 2023). Chapter 5 Designing Green Infrastructure for Multiple Functions sets out the ways GI can help with climate change/resilience including ecosystem functions, biodiversity and pollination, soils, water, carbon and energy, temperature, and air quality as well as other functions such as health. In particular, section 5.6 Carbon and energy is particularly relevant to this SPD. With regard to habitat creation/restoration, it outlines “The restoration and creation of habitat results in the removal of carbon dioxide from the atmosphere and the sequestration of carbon in soil and woody vegetation. Wetlands, woodlands, tree plantings and permanent grasslands all store carbon. Re-wetting the landscape and creating sponge cities increases this. Habitat restoration and creation through the provision of green infrastructure, represent the most effective means of climate change mitigation, however it should be noted that it can take many years for habitats to mature, and it is important that sites continue to be managed appropriately”.</p>	<p>New Forest District Council benefits from a sub-regional Green Infrastructure Strategy produced by the Partnership for South Hampshire. Whilst it acknowledges the importance of green and blue infrastructure to mitigate and adapt to climate change, the Council considers that it does not need to expand on existing guidance in this SPD.</p>
43 Natural England	General	<p>To help with the development of climate change policy and action, Natural England has published a range of resources, including:</p> <ul style="list-style-type: none"> <li>• The Climate Change Adaptation Manual - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation</li> </ul>	<p>Comments noted. SPD to be amended to include reference to the Carbon Storage and Sequestration by Habitat 2021 report.</p>

		<p>responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.</p> <ul style="list-style-type: none"> <li>• The National Biodiversity Climate Change Vulnerability Model is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.</li> <li>• Carbon Storage and Sequestration by Habitat 2021 (NERR094) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.</li> <li>• The Nature Networks Evidence Handbook – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report (Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.</li> <li>• Natural England Climate Change webinars - a range of introductory climate change webinars available on YouTube.</li> </ul>	
44 Cranbourne Chase AONB	General	Our AONB Board has recently endorsed a Position Statement on Biodiversity and it expects all new development to follow that simple guidance whatever mechanisms government may eventually put in place.	Comment noted.
44 Cranbourne Chase AONB	General	As you know, CCAONB is also an International Dark Sky Reserve and we are concerned about light pollution, and combined effects with climate change. Our Dark Skies Advisor comments: Comments in the SPD and its Separate Companion Document on reducing lighting in order to reduce energy use are welcome, but there is a huge missed opportunity that is not addressed, viz mitigating climate change by preserving/enhancing the carbon sequestration provided by photosynthesisers. Given the growing evidence of the harm visited on flora by artificial light at night	A separate biodiversity SPD is being prepared and this would be the appropriate document to address this issue.

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

		(ALAN), measures to control ALAN would complement other measures to mitigate climate change. Such measures would, of course, also have beneficial effects on biodiversity.	
44 Cranbourne Chase AONB	General	Our Position Statements and Good Practice Notes can be found on our web site; Landscapes and Planning Publications - Cranborne Chase AONB do feel free to refer to them.	Comment noted.
37 Hordle PC	79	Concern about the noise heat pumps generate	AHSP noise levels must not exceed 42dB(A) at the boundary of an adjoining property (about the level of a refrigerator running).
29 Historic England	89	Add new para after 89: “When considering the deployment of on-site renewable generation, consideration needs to be given to local context, including the character of the area.”	Suggested wording incorporated into the preceding para 88 Consider a general reference to design and character and the planning balance with other relevant policies e.g. by addition to para 7.
29 Historic England	90	NE recommend the inclusion of a sentence at the outset, by addition to para 90, that recognises the value of embodied carbon in the existing building stock: “As a result, there are significant carbon benefits from retaining existing buildings and adapting them where appropriate, rather than demolishing them for new build”.	Agreed – SPD to be amended accordingly.
29 Historic England	<b>Companion document</b> pp 46, 47, 51, 59, 64	Recognising that the companion document is not the focus of the consultation and is largely extracted from an existing publication, NE suggest various succinct clarifications or amendments.	As the companion document was extracted from an existing publication it would not be appropriate to make amendments. The final version of the SPD will simply refer to the existing publication (the Net Zero Carbon Toolkit).