

APPENDIX 2 Table of Representations and Officer Responses for Sustainable Building Design SPD

Rep No.	Full Name	Organisation Details	Section/ paragraph No.	Title	Summary Response	Officers Response	Recommended Change
8	Miss Charlotte Handscomb (On behalf of Sovereign Harbour Ltd)	DPP	Whole Document	Sustainable Building Design SPD	The SPD rests upon the adoption of draft Core Strategy Policy D1 in particular. The checklists as contained in the SPD duplicate many of the requirements of the Code for Sustainable Homes and BREEAM criteria. This places an unnecessary burden which also holds little weight in improving the sustainability of developments. Confirmation needs to be provided that the Carbon Buyout Fund will only be applied where viable.	It is necessary to maintain the checklists for all development in order to draw the applicant's attention to the importance of sustainable building, and in order for the Council to monitor sustainable development across the town. Details of the Carbon Buyout Fund will be added in due course.	The checklists will be amended to show the following; that new development is compliant with CSH Level 4/BREEAM Very Good Standard, meets the requirements of the EOP and in larger developments, that the application has been submitted with the required Biodiversity Survey.
9	Miss Rose Freeman	The Theatres Trust	Whole Document	Sustainable Building Design SPD	The Trust is currently delivering specific environmental sustainability advice to 48 London venues as part of an ERDF/LDA funded project, called 'Ecovenue'. Details have been provided through a weblink.	Comments noted. Thank you for the information provided.	
10	Mr Simon Millett	Sport England	Whole Document	Sustainable Building Design SPD	Sport England has produced a design guidance note promoting the sustainable design of sports, recreation and leisure facilities. Details have been provided through a weblink.	Comments noted. Thank you for the information provided.	
11	Mr John Henderson	Highways Agency	Whole Document	Sustainable Building Design SPD	The Highways Agency welcomes the commitments to more sustainable modes of transport within the document. Measures introduced at the outline stage can have more chance	Support welcomed.	

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					of success than those introduced at a later time when other habits have already been established.		
24	Mrs Scarlett McNally	Chair Bespoke cycle group	1	Introduction	Developers should consider how to incorporate the sustainable travel requirements of the staff working at a new build, and the customers, clients and visitors accessing it.	Comments noted. Paragraph 1.3.4 does mention that sustainable development should reduce the need to travel, and this is subsequently covered in detail in Section 5.10, with considerable emphasis on cycling.	
23	Mrs Scarlett McNally	Chair Bespoke cycle group	1.1.2	Introduction	Please add: "Eastbourne Cycling Strategy"	Comments noted.	Paragraph 1.1.2 additional final bullet point to read 'The Eastbourne Cycling Strategy 2012'.
12	Mrs Scarlett McNally	Chair Bespoke cycle group	1.1.3	Introduction	We agree that the SPD should address "transport and air quality" inter alia.	Support welcomed.	
2	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	2	Planning Policy Context and Key Sustainable Building Design Objectives	The Core Strategy Submission Policy D1 retains the requirements for reducing site waste generation and water efficiency. This duplicates requirements that are already in place through regulations or through the Code requirements. We consider this obligation should be removed from Policy D1 and that the draft SPD should be amended accordingly.	The requested change would weaken Policy D1, which is already sufficiently flexible. Policy D1 of the Submission Core Strategy, has recently been subject to an examination in public.	Await the findings of the Inspectors report on the Core Strategy.
1	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	2.1.2	International and National Planning Policy Context	The SPD refers to the Government's 80% CO2 reduction target for 2050 set against a 2005 baseline. The Government baseline year is 1990. In addition, the interim	Suggestion accepted.	Amend para 2.1.2 to read '...and sustainable development in planning. The Government has set a legally binding target of at least an 80% cut in

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					target is a 34% reduction by 2020, not 37% as stated.		greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline’.
3	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	2.1.4	International and National Planning Policy Context	The SPD refers to requirements for new homes to be built to Code for Sustainable Homes standards. Reference needs to be made to commercial developments, and the corresponding BREEAM requirements which are referenced in the Checklists.	Suggestion accepted.	Amend paragraph 2.1.4 to read ‘...on the Code for Sustainable Homes. For all new commercial development, standards will be based on the British Research Establishment Environmental Assessment Method (BREEAM)’.
13	Mrs Scarlett McNally	Chair Bespoke cycle group	2.2.1	Local Planning Policy Context	Bespoke Cycle Group agree on the need to “make walking, cycling and access to public transport a priority”	Support welcomed.	
14	Mrs Scarlett McNally	Chair Bespoke cycle group	2.3.2	Key Sustainable Building Design Objectives	We agree “To promote sustainable forms of travel by encouraging the provision of high quality cycling facilities and the provision of a convenient and safe walking environment in new developments.”	Support welcomed.	
4	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	2.3.3	Key Sustainable Building Design Objectives	There is a discrepancy between the requirements for a planning application between the Core Strategy policies and the SPD in that the Core Strategy Policy D1: Sustainable Development does not refer to the completion of a checklist. This is the correct approach and the SPD should reflect this.	See response to Rep no. 8	See response to Rep no. 8

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					It is considered that the Checklist in the SPD is an unnecessary burden .		
20	Mrs Scarlett McNally	Chair Bespoke cycle group	3.1.1	Which Checklists do I need to submit?	Checklist "to remind applicants" is a good concept. People considering developments may not read the whole SPD, but will certainly read the checklist, so everything important should be on the checklist as a reminder.	Support welcomed	
21	Mrs Scarlett McNally	Chair Bespoke cycle group	3.3.1	Checklist B	Bespoke Cycle Group agree on the need to "raise awareness"	Support welcomed	
22	Mrs Scarlett McNally	Chair Bespoke cycle group	4.2.2	BREEAM	The BREEAM standards include those for sustainable transport. These should be incorporated clearly into the SPD, otherwise they may be overlooked.	BREEAM criteria changes regularly. Reference will be made to the BREEAM website, where the most up to date information can be found.	
28	Mrs Scarlett McNally	Chair Bespoke cycle group	4.2.2	BREEAM	Some of the BREEAM standards relating to cycling are stated in the SPD.	See Rep 22.	
5	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	5	Sustainable Building Design Topics	Three main issues have been identified within the information provided in Chapter 5. There is little information to cover commercial schemes other than where measures can apply to all forms of development. Information on masterplanning or larger scale developments is needed. Information on each sustainable design topic is likely to become outdated	The SPD is an evolving document which will be reviewed and updated. This will ensure that new technologies are referenced and new options are identified.	See rep 28.

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					within the next few years as technology advances and alternative/new options are identified.		
29	Debra Ivory	South East Water PLC	5.4	Using Water Efficiently	The measures to encourage water efficiency in the SPD are supported.	Support welcomed.	
30	Sarah Harrison	Southern Water	5.5.3	Minimising Flood Risk and Reducing Surface Water Run-off	<p>For a development to be sustainable, it must not be permitted without provision for any necessary off-site as well as on-site sewerage infrastructure.</p> <p>The following bullet points should be added to paragraph 5.5.3:</p> <ul style="list-style-type: none"> • The development connects to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water. • No surface water is connected to the foul sewerage system unless evidence is provided to demonstrate that all other options are not practicable. 	Suggestion accepted.	<p>Paragraph 5.5.3 add additional bullet points as follows;</p> <ul style="list-style-type: none"> • 'The development connects to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water. • No surface water is connected to the foul sewerage system unless evidence is provided to demonstrate that all other options are not practicable'.
15	Mrs Scarlett McNally	Chair Bespoke cycle group	5.10.1	Encouraging More sustainable Methods of Transport	The way people travel to and from a development is an important consideration. A significant amount of energy in the Borough is wasted through inefficient transport. More efficient energy consumption can be achieved through the greater use of public transport and the promotion of cycling and walking and the reduced reliance of private vehicles	Comments noted.	

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					such as cars		
16	Mrs Scarlett McNally	Chair Bespoke cycle group	5.10.5	Encouraging More sustainable Methods of Transport	Facilities for Cyclists - Provision for cycle parking is essential to support the development of cycling as a practical transport choice.	Comments noted.	
17	Mrs Scarlett McNally	Chair Bespoke cycle group	5.10.6	Encouraging More sustainable Methods of Transport	When a cycle parking area is being provided it should: <ul style="list-style-type: none"> • Incorporate Sheffield stands (or the equivalent) or wall mounted bars. • Wheel slots or butterfly racks are not usually acceptable; • Be protected from the weather with a roof over the stands; • Be positioned where it would be overlooked by the public or staff; or at least CCTV, in order to maximise the actual and perceived level of security; • Be positioned where it can be easily reached from access routes and where its use would not conflict with pedestrians; and • Be appropriately lit in order to discourage crime and improve visibility for users. 	Comments noted. Thank you for the information provided.	
18	Mrs Scarlett McNally	Chair Bespoke cycle group	5.10.7	Encouraging More sustainable Methods of Transport	If the cycle parking is intended for long-stay use, the applicant should consider providing shelters with lockable gates in order to provide greater security for the bicycles.	Comments noted.	
19	Mrs Scarlett	Chair Bespoke cycle	5.10.8	Encouraging More	In major employment developments it should also	Comments noted.	See response to rep no. 8

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	McNally	group		sustainable Methods of Transport	be practicable to incorporate showers, changing facilities and lockers to enable employees to travel to work by bicycle.		
27	Mrs Scarlett McNally	Chair Bespoke cycle group	6.2.1	Monitoring	Please add: "% of developments which have contributed to the network of cycle routes in Eastbourne"	With the introduction of CIL, this would not be possible to monitor.	
25	Mrs Scarlett McNally	Chair Bespoke cycle group	6.2.1	Monitoring	Monitoring Please add: "% of non-residential developments which have plans for cycle parking incorporated"	This would not be possible to monitor.	
32	Sarah Harrison	Southern Water	Appendix 1	Summary Table	The following bullet points should be added to paragraph 5.5.3: <ul style="list-style-type: none"> • The development connects to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water. • No surface water is connected to the foul sewerage system unless evidence is provided to demonstrate that all other options are not practicable. 	Comments noted.	Amend Checklist section 5.5 with additional bullet point to read; 'Does the development connect to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water?' And; 'If surface water is to be connected to the foul sewerage system, has it been demonstrated that all other options are not practical?'
26	Mrs Scarlett McNally	Chair Bespoke cycle group	Appendix 1	Summary Table	Please add a weblink to the Eastbourne Cycling strategy to the checklist, into both Checklist A and checklist B?	Suggestion accepted	Paragraph 5.10.5 to be amended to include weblink and to read '....practical transport choice. Eastbourne Borough Council is committed to providing a safer network of routes

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							across the town for cycling and other sustainable means of transport. The Eastbourne Cycling Strategy 2012 website provides details on cycling and cycle routes within Eastbourne. Web link to be included on the SPD webpage also.
7	Miss Charlotte Handscomb On behalf of Sovereign Harbour Ltd)	DPP	Appendix 3	Code for Sustainable Homes Tables	Guidance on the Code for Sustainable Homes is provided, however no corresponding guidance is provided for BREEAM, for developers of commercial developments. This appendix should be updated so as to provide guidance all types of development, both residential and commercial.	Appendix 3 is to be deleted, as the Code for Sustainable Homes is already referenced through the planning portal. Criteria for the Code for Sustainable Homes and BREEAM are constantly changing, so reference to the websites will provide the most accurate and up to date information.	