

# Consultation Statement

## Sustainable Construction Supplementary Planning Document

March 2022



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# 1 Introduction

East Suffolk Council has produced the Sustainable Construction Supplementary Planning Document (SPD). The purpose of this document is to provide guidance on a range of topics including energy efficiency, renewable energy, water conservation, and use of materials, to support the implementation of East Suffolk Council's Local Plan policies.

This SPD does not add any additional policies, but rather provides guidance to assist with the implementation of the sustainable construction policies contained within the East Suffolk Council - Suffolk Coastal Local Plan (September 2020) and the East Suffolk Council - Waveney Local Plan (March 2019). This SPD was prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Under part 12 of the Regulations, a local planning authority must undertake a programme of consultation when preparing an SPD. The Council is also required to undertake consultation on the draft SPD under Regulation 13.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is also set out in its Statement of Community Involvement (SCI). At the start of preparation of the SPD the Statements of Community Involvement adopted in September 2014 were in place (covering the former Waveney and Suffolk Coastal districts). The Council adopted a new Statement of Community Involvement in April 2021 which applies to the consultation on the draft SPD and to the adoption of the SPD. While preparing the Sustainable Construction SPD East Suffolk Council has consulted with relevant organisations and members of the public, in accordance with the SCI. Details of this consultation process are set out below.

An initial stage of consultation was held between 15<sup>th</sup> March and 26<sup>th</sup> April 2021. A formal consultation on the Draft SPD was held between 1<sup>st</sup> November and 13<sup>th</sup> December 2021.

A Consultation Statement was produced to accompany the formal consultation on the Draft SPD and has subsequently been updated to reflect the consultation responses received during that consultation.

## 2. Who was consulted?

Consultation was split into two stages: an initial stage that informed the preparation of the Draft Supplementary Planning Document; and a formal stage of consultation that sought views on the Draft SPD.

### Initial consultation

The initial consultation was carried out between 15<sup>th</sup> March and 26<sup>th</sup> April 2021. The following organisations and groups were directly consulted as part of the informal stage of consultation, and the consultation was also made available to the public on the Council's website:

- Town and Parish Councils
- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

#### Consultation on the Draft SPD

Consultation on the Draft SPD was held between 1<sup>st</sup> November and 13<sup>th</sup> December 2021. At the formal stage of consultation, all of those registered on the Council's planning policy mailing list were directly consulted, including those listed above. Steps were taken to advertise the consultation to others, as set out below.

### 3. How were they consulted?

There were two stages to the consultation process, which are set out below.

#### **Initial consultation**

The initial consultation ran from 15<sup>th</sup> March and 26<sup>th</sup> April 2021 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/SustConSPD/consultationHome>

The consultation was advertised on the Council's website, as well as on social media. The consultation was also advertised through a press release and public notices in the Beccles and Bungay Journal, Lowestoft Journal, East Anglian Daily Time and the Eastern Daily Press. The Press release and public notices that accompanied this consultation can be found in Appendix 3 and 4.

A questionnaire, providing some background to the consultation and asking a series of questions, was published on the Council's website. Town and Parish Councils, elected members and other organisations referred to above were notified directly by email or post.

The consultation asked the following questions:

1. Do you consider that the proposed content is appropriate?  
Yes/No  
If no, please suggest how the scope and content should be amended.

2. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD](#) (2013) that should be retained?  
Please provide details.
3. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD](#) (2013) that should **not** be retained?  
Please provide details.
4. Are there any specific elements of the Local Plan policies that you consider require further guidance in the document?  
If yes, please explain what guidance is required.
5. Are there any elements of national policy on sustainable construction that you consider require additional guidance in the document?  
If yes, please explain what guidance is required.
6. What specific sustainable design and construction measures do you consider could be incorporated in developments of 10 or more new dwellings?
7. What specific sustainable design and construction measures do you consider could be incorporated in new commercial properties of 1,000sqm gross floorspace or more?
8. Do you have any views on sustainable design and construction that you consider should be addressed in the document?
9. Do you have any views the Council's [Environmental Guidance Note](#) being included as an Appendix within the SPD?
10. Are you aware of any good practice from elsewhere that could be applied in East Suffolk?  
If yes, please provide details.
11. Are you aware of any examples of good sustainable design and construction in East Anglia that could be used as a case study within the Sustainable Construction SPD?
12. Please let us know if you have any other comments.

Hard copies of the document were also made available free of charge by post by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public, due to the Covid-19 pandemic.

The initial consultation was presented at East Suffolk Council's Developer Forum meeting on 15<sup>th</sup> April 2021. The presentation included information on proposed scope and content, questions for discussion and links to the consultation documents.

In total 26 individuals and organisations responded to the consultation. Between them they made 75 comments.

Full copies of the responses have been published on the Council's website at

<https://eastsuffolk.inconsult.uk/SustConSPD/listResponses>

### **Consultation on the Draft SPD**

The Draft Sustainable Construction SPD consultation ran from 1<sup>st</sup> November and 13<sup>th</sup> December 2021 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/SUSCONSPDDRAFT/consultationHome>

The consultation was advertised on the Council's website, as well as on social media. 4,069 emails and 583 letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes town and parish councils, individuals, and organisations including those who were previously contacted or responded to the informal stage of the consultation. The list of consultation bodies can be found at Appendix 1.

The consultation was advertised through the use of posters (provided to Town and Parish Councils and libraries), a press release and social media posts. The poster and an example Twitter post that accompanied the consultation can be found in Appendix 5, 6 and 7.

Hard copies of the draft Sustainable Construction SPD and accompanying Consultation Statement were made available at all libraries in the district and in the Council's Customer Service Centres at the Marina Centre in Lowestoft, Woodbridge Library and Felixstowe.

Due to the ongoing impacts of the Covid-19 pandemic, for those unable to view the documents online, at a library or in the Customer Service Centres, an offer of assistance along with contact details for the Planning Policy and Delivery Team was included on letters, emails and the poster.

In total 24 individuals and organisations responded to the consultation. Between them they made 52 comments. The responses are summarised in Appendix 8, along with a description of how the comments have been addressed.

Full copies of the responses have been published on the Council's website at

<https://eastsuffolk.inconsult.uk/SUSCONSPDDRAFT/listResponses>

## Appendix 1: Consultation Bodies

The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

### **Specific consultation bodies**

- The Coal Authority
- Environment Agency
- English Heritage
- Marine Management Organisation
- Natural England
- Network Rail
- Highways Agency
- Suffolk County Council
- Parish and Town Councils within and adjoining East Suffolk
- Suffolk Constabulary
- Adjoining local planning authorities – Ipswich Borough Council, Mid Suffolk District Council, Babergh District Council, Great Yarmouth Borough Council, Broads Authority, South Norfolk District Council
- Anglian Water
- Essex and Suffolk Water
- Homes England
- Electronic communication companies who own or control apparatus in the Suffolk Coastal District
- Relevant gas and electricity companies
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

### **General consultation bodies**

- Voluntary bodies some or all of whose activities benefit any part of the District
- Bodies which represent the interests of different racial, ethnic or national groups in the District
- Bodies which represent the interests of different religious groups in the District
- Bodies which represent the interests of disabled persons in the District
- Bodies which represent the interests of persons carrying on business in the District

- Bodies which represent the interests of environmental groups in the District

**Other individuals and organisations**

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.



## Appendix 2: Initial Consultation

The table below lists the main issues raised in the initial consultation responses, the Council's response and how they informed the preparation of the document.

*The online consultation page was updated on the 25<sup>th</sup> March 2021. The consultation page was updated, following a technical error that had allowed anonymous responses, to request the name of respondents and to ensure that responses were made to the questionnaire only. Any responses submitted before that date are still accepted and are included in the table below.*

### 1. Do you consider that the proposed content is appropriate?

Respondent	Summary of comments	Council response
Dickerson, Adrian & Greta	<p>Scope of existing SPD strongly supported, although scope of new SPD not directly covered in the response.</p> <p>Respondent commented that use of renewable energy to result in net export of energy from new development should be the standard, together with better overall air-tightness/fabric standards for insulation. Recognises this is cheaper, easier and more efficient to design this technology in during the initial build phase rather than having to retrofit.</p> <p>Suggests the range of EV vehicles (i.e. without charging) would meet the needs of most people just with charging at home, with the odd longer-distance trip requiring en-route</p>	<p>The draft SPD advocates following the energy hierarchy, as set out in Chapter 3. Under the energy hierarchy first consideration is given to reducing the need for energy, second to using energy more efficiently and third to supplying energy from sustainable sources.</p> <p>The provision for electric charging points is set out under Policy SCLP7.1 Parking Proposals and Standards and Policy WLP8.21 Sustainable Transport the Sustainable Construction SPD has incorporated this into the sustainable development checklist in Appendix D.</p>

	<p>electric charging points. It was suggested that EV charging points should be provided to support longer trips (e.g. at service stations in the district). It was commented that charging points at workplaces would help to meet the needs of electric vehicle owners with longer commutes.</p>	
<p>Bawdsey Parish Council</p>	<p>The respondent suggests that there should be more best practice examples relating to larger scale housing developments. Reference is made to the RTPI's 2018 guide 'Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change', including a number of suggestions for setting ambitious climate change policies including policies to improve on Building Regulations energy efficiency standards.</p> <p>Highlights the importance of the language used in the SPD - 'could', 'should' and 'may' versus 'must', 'will' and 'shall'.</p> <p>It is suggested that the SPD should be very encouraging of anaerobic digestion proposals for biogas. Case study of Bentwaters and the use of biogas to fuel public transport in Sweden provided.</p> <p>It is suggested that encouragement and guidance should be provided in the SPD on maximising south-facing roof surface area for optimising the use of PV panels. Respondent feels very strongly that developers have a duty to at least provide the opportunity (through unit design) for the installation of PV panels and solar heating at a later date (retrofitted), if not included for in the original unit design.</p>	<p>The SPD cannot create new policies. The Local Plans both contain policies on Sustainable Construction which the SPD will provide guidance on. Policy SCLP9.2 Sustainable Construction of the Suffolk Coastal Local Plan sets out policy securing a 20% increase in energy efficiency above Building Regulations requirements on developments of more than 10 dwellings. Policy SCLP9.2 and Policy WLP8.28 Sustainable Construction both require BREEAM 'very good' for certain non residential; developments. Both policies also require all new development to meet the higher water use standard of 110 litres per person per day.</p> <p>As the SPD is providing guidance it cannot require development to meet certain standards that are not set out in the adopted Local Plan policies.</p> <p>Chapter 6 provides guidance in relation to anaerobic digestion proposals and reference to south facing roofs to support solar generation is included in the section on Siting, Form and Orientation.</p>

Saxmundham Town Council	There should be a section about wildlife friendly design such as fences that allows hedgehogs and frogs to move between gardens.	This guidance has been incorporated into Chapter 8 Natural Environment of the Draft SPD.
Anonymous Respondent 5	<p>The SPD should provide guidance on Policy WLP8.24 of the Waveney Local Plan.</p> <p>Anglian Water will be looking to develop more renewable energy from wind and solar so guidance should not be limited to community led schemes.</p> <p>Water conservation and sustainable drainage should appear as one chapter to link water re-use measures with SuDS.</p>	Chapter 2 on Water Efficiency and Management in the Draft SPD provides guidance relating to Policy WLP8.24.
Peter Freer, Suffolk County Council	The County Council is pleased with the proposed content and supports its purpose.	Support for the content is appreciated.
Pigeon Investment Management representation from Turley	<p>The respondent supports the content of the SPD but believes other issues should also be consider including:</p> <ul style="list-style-type: none"> <li>- The SPD should incorporate sufficient flexibility to take individual site constraints into consideration recognising the need the to efficiently deliver new housing and impact of additional financial requirements</li> <li>- It is also important to recognise the requirements of Town and Country Planning Regulations (2012) in respect of the relationship between Local Plans and SPDs, with the role of SPDs to provide further guidance on particular matters or sites, and should not be used to introduce new requirements which are not set out in the Local Plan.</li> </ul>	<p>Support for the content is appreciated.</p> <p>Planning Policies in the Local Plans provide sufficient flexibility and the whole of the Local Plans have been viability tested.</p> <p>The requirements of the Town and Country Planning Regulations (2012) have been considered.</p> <p>Reference to the planning policies being impacted by Future Home Standard is made in Chapter 12 Making a Planning Application.</p> <p>Site allocations and planning policies in the have been viability tested as part of the whole Local Plan. Planning</p>

	<ul style="list-style-type: none"> <li>- It is important that the SPD confirms that the Future Home Standard (FHS) will supersede local policy once adopted. It is also important for the SPD to recognise that the method of achieving the FHS is the responsibility of the developer or housebuilder and the SPD should not require specific technologies to meet Building Regulations.</li> <li>- The SPD should recognise that each development site is unique and that there are often site specific constraints that impact upon viability.</li> <li>- The SPD must be flexible enough to adapt to future Building Regulation changes.</li> <li>- Over the course of the SPD it is highly likely that the BREEAM Standard will be updated by the Building Research Establishment (BRE). Should an update to BREEAM occur the SPD must recognise that it cannot simply request the previous rating without understanding the constraints of the new BREEAM methodology.</li> <li>- The SPD must not introduce new standards or requirements that are not contained within the Local Plan without formal technical and viability testing. Furthermore the SPD must consider if there any additional indirect costs or technical requirements resulting from specific measures. An example of this point could occur if the SPD chooses to make a specific recommendation for the installation of Electric Vehicle (EV) charging points in dwellings or buildings</li> </ul>	<p>Policies SCLP9.2 Sustainable Construction and WLP8.28 clearly state that exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.</p> <p>It is recognised that changes to Building Regulations may impact the requirements and implementation of the Planning Policies in the Local Plans. Chapter 12 confirms that further technical guidance may be produced in the future in response to changes once they adopted.</p> <p>The SPD does not introduce new standards relating to BREEAM, vehicle charging points or Planning Policies in the Local Plans.</p> <p>General guidance and support for SuDS is provided in the SPD, but reference is made to Suffolk County Council and their guidance Flood Risk Management Strategy (2018) and in particular <i>Appendix A: Sustainable Drainage Systems (SuDS) – a Local Design Guide</i> in chapter 2 of the SPD.</p> <p>CHP Heating systems in one of a number of renewable and low carbon technologies detailed in chapter 10.</p> <p>The focus on the environmental pillar of sustainability is considered appropriate for this SPD which seeks to primarily assist in the interpretation and implementation of planning</p>
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	<ul style="list-style-type: none"> <li>- Sustainable drainage systems are proposed to be included in this SPD, Pigeon are aware of specific Suffolk County Council guidance with respect to this issue and therefore this topic should be excluded.</li> <li>- The SPD should recognise the significant sustainability benefits that will occur as a result of decarbonisation of the national grid. As a result of grid decarbonisation described above, it is widely recognised that gas fired Combined Heat and Power (CHP) heating systems are no longer the most sustainable option for large residential and mixed use developments given the carbon content of gas will be higher than grid electricity within a couple of years. The SPD should recognise the constraint of this technology and not request the use of gas fired district heating systems on any sites.</li> <li>- At present the SPD is solely focused on the environmental pillar of sustainable development however Pigeon believe that the social aspect is of equal importance and should be recognised by the SPD. For example if a site is providing a higher proportion of affordable housing or critical infrastructure such as schools, then the SPD should recognise this as positive commitment.</li> <li>- The SPD should allow flexibility with the implementation of the measures it prescribes and make it clear that it is not expected that all measures described therein are adopted</li> </ul>	<p>policies SCLP9.2 Sustainable Construction and WLP8.28. Sustainable Construction.</p> <p>The SPD provides flexibility by suppling a range of sustainable measures that developers could utilise to increase the sustainability of their developments.</p>
Paul Cobbold	<p>Respondent desires tougher air tightness targets for new buildings to reduce heat loss and energy consumption.</p> <p>Respondent notes that builders have a lack of</p>	<p>The Council does not set national Building Regulations. The SPD provides guidance in information to support the planning policies in the two Local Plans.</p>

	understanding regarding air tightness resulting in a poor quality installation of materials a “performance gap”	
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2. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD \(2013\)](#) that should be retained?  
Please provide details.

Respondent	Summary of comments	Council response
Bawdsey Parish Council	The list of case studies in the existing SPD should be updated.	Recent case studies and photographs have been included.
Westerfield Parish Council	The basis of the Renewable Energy and Sustainable Construction SPD (2013) is still applicable but in rewriting for the new SPD there are more up-to-date references and standards that can be incorporated.	Comment noted. The SPD will reflect current policies.
Pigeon Investment Management representation from Turley	Pigeon believe that the new SPD should not retain any of the technical information contained in the 2013 SPD due to advances in building design, building regulations, renewable energy technologies and indeed the knowledge of sustainable design and construction which justify a completely new SPD utilising the headings outlined in this consultation document.	Information in the 2013 SPD has been reviewed and where relevant has been updated for inclusion in the new SPD.

3. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD \(2013\)](#) that should **not** be retained?  
Please provide details.

Respondent	Summary of comments	Council response
Bawdsey Parish Council	Any Cases now considered inappropriate should be augmented with a brief "Learning Points" Addendum as to why they are no longer applicable.	Recent case studies and photographs have been included. This is considered to provide clearer guidance than updating previous case studies with learning points.
Westerfield Parish Council	3. The basis of the Renewable Energy and Sustainable Construction SPD (2013) is still applicable but in rewriting for the new SPD there are more up-to-date references and standards that can be incorporated	Comment noted. The Draft SPD reflects current policies.
Pigeon Investment Management representation from Turley	Pigeon believe that the new SPD should be drafted using the very latest technical information and that none of the previous information should be retained.	Information in the 2013 SPD has been reviewed and where relevant has been updated for inclusion in the new SPD.
Paul Cobbold	The respondent does not consider the information in the "Code for sustainable homes" worth retaining. The respondent recommends reducing the heat loss, using passive solar gain, using solar shading, increasing air tightness standards, incorporating MVHR and using higher quality products that last longer.	The Code for Sustainable Homes was withdrawn by the Government. The SPD includes chapters on Energy Efficiency and Carbon Reduction, Materials, Sitting, Form and Orientation, and Renewable and Low Carbon Energy Technologies.

#### 4. Are there any specific elements of the Local Plan policies that you consider require further guidance in the document?

Respondent	Summary of comments	Council response
Felixstowe Town Council	There should be more precise guidance on Policy SCLP9.2: Sustainable Construction, Policy SCLP9.7: Holistic Water Management and a high quality of evidence for drainage issues.	The SPD contains detailed guidance on the implementation of Policy SCLP9.2. Guidance on water management and drainage is covered in Chapter 2 Water Efficiency and Management.
Bawdsey Parish Council	All key subject areas appear to be covered, but need to see the detail.	Comment noted.
Saxmundham Town Council	There should be Wildlife friendly design for larger developments.	This guidance has been incorporated into Chapter 8 Natural Environment of the Draft SPD.
Boyton Parish Council	Guidance on "meaningful proportion" in the sentence "a meaningful proportion of the energy consumed by new builds or conversions should be provided from an on-site renewable source" in SCLP9.2 precursor text (paragraph 9.19).	The Policy SCLP9.2 does not require a specific proportion of energy to be generated onsite. The national Planning Policy Guidance does not permit Local Planning Authorities to request this. Support is provided in Chapter 9 of the Draft SPD for a variety of renewable and low carbon technologies that generate energy on site.
Anonymous Respondent 5	Guidance should cover the multifunctional benefits of SuDS and the design of different types of water re-use measures. Guidance should be provided on integrated water management including how water efficiency in homes, water re-use measures and surface water drainage will be achieved.	Chapter 2 on Water Efficiency and Management contains guidance on approaches to securing the multifunctional benefits of SuDS as well as guidance on water efficiency and re-use measures.



Pigeon Investment Management representation from Turley	Pigeon believe if the proposed SPD structure and the content of these representations are implemented than this should address all relevant sustainability policies.	Comment noted.
Paul Cobbold	Respondent recommends addressing the issue of "embodied energy" and the continual use of brick and block cavity construction. Brick and block walls performed poorly compared to timber framed construction, or pre-fabrication panel systems. Regulators should lead and force change.	The Council does not set national Building Regulations. Guidance on embodied carbon is provided in chapter 3, guidance on materials such as brick is provided in chapter 4, and guidance on construction methods is provided in Chapter 10.

## 5. Are there any elements of national policy on sustainable construction that you consider require additional guidance in the document?

Respondent	Summary of comments	Council response
Felixstowe Town Council	Request for guidance on understanding the interaction of the NPPF, Building Regulations and other relevant public policy to sustainable construction when considering planning applications.	The SPD refers to the relevant parts of the NPPF and the Building Regulations where applicable. The role of the Building Regulations is, in particular, set out in relation to implementing the planning policies on water use and energy efficiency.
Bawdsey Parish Council	Reference should be made to national matters covered in the RTPI's 'Rising to the Climate Crisis / A Guide for Local Authorities on Planning for Climate Change'.	National planning policy is set out in the National Planning Policy Framework which is referenced in the document where relevant.
Pigeon Investment Management	Pigeon believe that the SPD could be simplified by deferring all matters relating to energy and carbon reductions to the Building Regulations. This action would avoid duplication of	The Future Home Standard has been taken into consideration when developing the SPD. Guidance has been provided on energy and carbon reduction for those wish to maximise

representation from Turley	resources to meet similar policies at both a national and local level.	opportunities and exceed the requires of the Building Regulations.
Paul Cobbold	<ol style="list-style-type: none"> <li>1. Reduced heat load</li> <li>2. Air tightness standards</li> <li>3. Solar shading and how best to achieve it effectively</li> <li>4. Modern methods of construction and move away from traditional building practices</li> <li>5. MVHR in most new dwellings to improve air quality and ventilation</li> <li>6. Put more emphasis on quality of construction rather than quantity to eliminate the "performance gap"</li> </ol>	The Council does not set national Building Regulations. However, the Draft SPD provides guidance on energy efficiency in chapter 3, solar gain and shading in chapter 6, methods of construction in chapter 10 and renewable and low carbon technologies in chapter 9.

## 6. What specific sustainable design and construction measures do you consider could be incorporated in developments of 10 or more new dwellings?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	<p>The respondent would like the following content added to the scope of the SC SPD:</p> <ul style="list-style-type: none"> <li>• Shared communities gardens</li> <li>• Shared communities allotments</li> <li>• Shared recycling facilities, especially for glass</li> <li>• Shared secure bicycle lock-ups and/or secure bicycle lock-up facilities at the front of properties</li> </ul>	<p>The provision of such communal garden areas and allotments is incorporated in Chapter 8 on the Natural Environment. The Sustainable Development checklist in Appendix D refers to the provision of secure on-site cycle storage, as does Chapter 11 on Healthy Buildings and Places.</p>
Felixstowe Town Council	Sustainable construction should be site wide, not individual dwellings basis.	The draft SPD contains guidance that applies at the site level such as in relation to healthy places (Chapter 11) and drainage (Chapter 2). It is appropriate for energy efficiency requirements to be required at individual building level in

		order that this can be implemented through Building Regulations in accordance with Policy SCLP9.2.
Bawdsey Parish Council	BREEAM Level 4 or BRE HQM standards, which demand serious consideration for the inclusion of Renewable energy facilities or Passivhaus principles.	Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Westerfield Parish Council	For developments of 10 or more dwellings serious consideration should be given to incorporating sustainable design and construction measures for the whole complex. It is reasonably economical to incorporate these within a development compared to single properties and greater requirements should be applied to larger developments.	Policy SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan requires all new developments of more than ten dwellings to result in a 20% reduction in CO2 emissions below the Building Regulations. Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Water Management Alliance	Drainage Hierarchy/SuDS/Sustainable drainage solutions.	Chapter 2 on Water Efficiency and Management contains guidance on drainage and SUDS.
Boyton Parish Council	All new developments and conversions should be required to incorporate on site renewable energy generation. Roof top solar should be possible for most new dwellings.	The SPD cannot set new policy but can only provide guidance on existing policies.
Pigeon Investment Management representation from Turley	Pigeon believes the viability of implementing the sustainability measures within the SPD is somewhat (although not exclusively) linked to low housing delivery. Pigeon requests flexibility to respond to site specific constraints and consideration of green infrastructure, secure design, accessibility, sustainable transportation and social infrastructure.	The SPD does not introduce new planning policy requirements. All policy requirements are contained in the adopted Local Plans which have been subject to whole plan viability testing. A range of sustainability measures are provided in the SPD to allow a flexible approach.
Paul Cobbold	All new dwellings should use a heat pump rather than oil or gas. PV on many more new houses. Higher build and design standards as mentioned above.	The Council does not set national Building Regulations. However, the SPD provides guidance on renewable and low carbon technologies in chapter 9.

7. What specific sustainable design and construction measures do you consider could be incorporated in new commercial properties of 1,000sqm gross floorspace or more?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	Provision of secure bicycle lock-up facilities at should be provided at the front of properties.	Chapter 11 on Healthy Buildings and Places refers to the provision of secure cycle parking. Whilst this should be easily accessible the front of the house may not always be the best location.
Bawdsey Parish Council	BREEAM Level 4 or BRE HQM standards, plus consideration for economies of scale opportunity to incorporate community heating infrastructure like Ground Source Heating etc.	Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Westerfield Parish Council	Use of ultra-low carbon products should be a requirement and other alternative products to concrete.	Chapter 4 of the draft SPD sets out that concrete use should be minimised and suggests alternatives that are more sustainable.
Water Management Alliance	Drainage Hierarchy/SuDS/Sustainable drainage solutions	Chapter 2 on Water Efficiency and Management contains guidance on drainage and SUDS.
Boyton Parish Council	All such properties should be required to incorporate on site renewable energy generation. Roof top solar should be possible for most new dwellings.	The SPD cannot set new policy but can only provide guidance on existing policies.
Pigeon Investment	Pigeon supports the threshold of buildings of 1,000 sqm for applying the BREEAM standard however other factors may	Local Plan policies state BREEAM applies unless it can be demonstrated that it is not viable or feasible to do so. The

Management representation from Turley	<p>affect the technical and commercial viability of the BREEAM standard. Pigeon believe that the SPD should consider this flexibility when applying the BREEAM standard if evidence is provided by the sustainability statement.</p> <p>The SPD must recognise the need for flexibility with the application of the BREEAM standard particularly for any buildings that may require a significant element of refurbishment.</p>	SPD does not seek to change exiting planning policy in the Local Plans.
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8. Do you have any views on sustainable design and construction that you consider should be addressed in the document?

Respondent	Summary of comments	Council response
Bawdsey Parish Council	The Council is expected to have strong ideas on what is required to meet Government targets.	Comment noted.
Westerfield Parish Council	Effect on the environment from traffic generation should be considered and the whole life environmental sustainability.	The Sustainable Development checklist in Appendix D includes a section on sustainable transport. The Council is also producing a cycling and walking strategy to help to secure improvements for cycling and walking.
Pigeon Investment Management representation from Turley	Pigeon have presented a number of issues for consideration within Question 1 of this document which we believe are also applicable to question 8.	Comment noted.

9. Do you have any views the Council's [Environmental Guidance Note](#) being included as an Appendix within the SPD?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	The respondent felt that the Environmental Guidance Note would be valuable to include.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
Bawdsey Parish Council	The Environmental Guidance Note must be given obligation and purpose.	The Environmental Guidance is not a Supplementary Planning Document and therefore does not have statutory weight but is promoted by the Council as a guidance note which can apply beyond Planning.
Westerfield Parish Council	It should be included as an appendix.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
Boyton Parish Council	It makes sense to do this.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
Pigeon Investment Management representation from Turley	Pigeon have no objection to the inclusion of the Environmental Guidance Note within the SPD provided that it is made clear that the note is for guidance only and that only the requirements within the SPD are adopted policy, superseding this Guidance Note. The guidance note contains references to standards such as Passivhaus and the Home Quality Mark which have significant commercial and	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.

	technical requirements which have not been tested and approved within adopted policy.	
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## 10. Are you aware of any good practice from elsewhere that could be applied in East Suffolk?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	The respondent felt modular low-carbon eco-housing represented good practice that could be encouraged more in East Suffolk.	Guidance on modular building is included in chapter 10.
Bawdsey Parish Council	ESC lacks the expertise and knowledge to advise on such areas and therefore a local independent consultant should be used.	A number of examples and case studies have been sourced, to illustrate the guidance through the use of photographs and illustrations.
Boyton Parish Council	Good practices should be required in local policy.	The SPD cannot set new policy but can only provide guidance on existing policies.
Pigeon Investment Management representation from Turley	<p>Pigeon's approach to the implementation of sustainable development which has resulted in the delivery of a range of sustainable new communities in East Suffolk. Pigeon are focused on -</p> <ul style="list-style-type: none"> <li>• identify potential improvements to cycle and pedestrian links</li> <li>• identify opportunities to invest in public transport</li> <li>• measures to reduce everyday trips by car</li> </ul>	Pigeon's methods are noted and information on similar measures are provided in the SPD.

	<ul style="list-style-type: none"> <li>• provision of superfast broadband/fibre</li> <li>• ensure that sustainable travel behaviour is embedded within every scheme</li> <li>• meeting and where possible exceeding standards on environmental matters</li> <li>• meeting the Future Homes Standard by 2025</li> <li>• design schemes that the layout optimises the use of natural sunlight and ventilation,</li> <li>• utilising solar gains and ambient energy to help buildings respond to seasonal temperatures.</li> <li>• delivering sites that prioritise an 'electric only' strategy and avoid the use of natural gas</li> <li>• designing schemes with a fabric first approach</li> <li>• prioritise where possible the use of ground and air source heat pumps</li> <li>• deploy photovoltaic cells where appropriate to provide renewable electricity;</li> <li>• support measures that increase water efficiency and reduce water consumption</li> <li>• advocating LED technology as standard across buildings and where appropriate install smart meters in homes;</li> <li>• assess the feasibility of delivering energy positive homes as advocated by the UK Green Building Council.</li> <li>• use an ecologist to assist in maximising the ecological benefit of schemes</li> <li>• preserve and enhance vegetation on-site.</li> <li>• retain existing trees and hedgerows</li> </ul>	
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	<ul style="list-style-type: none"> <li>• where possible use new native planting</li> <li>• include sustainable drainage systems (SuDS) using the infiltration hierarchy.</li> </ul>	
Paul Cobbold	Yes. Germany, Holland, Belgium have better built buildings and the populations in those countries have higher expectations of quality.	The comments are noted. Local examples have been featured to inspire and demonstrate what is possible locally.

# 11. Are you aware of any examples of good sustainable design and construction in East Anglia that could be used as a case study within the Sustainable Construction SPD?

Respondent	Summary of comments	Council response
Felixstowe Town Council	<p>Case study suggestions:</p> <ul style="list-style-type: none"> <li>• Flagship scheme for site-wide shared ground source heat pumps (</li> <li>• Goldsmiths Street, Norwich</li> <li>• ESC's Deben School proposal</li> </ul>	The Council appreciates these suggestions and has incorporated images of the proposed development on the former Deben School site in Felixstowe.
Bawdsey Parish Council	Case studies could be from outside of East Anglia.	The Council has not limited itself to East Anglia specifically however through using local case studies users of the document may be familiar with these.
Boyton Parish Council	Forge Bungalow, Boyton, has been redeveloped with state-of-the-art insulation and a renewable energy focus.	<i>Photo to be sourced</i>
Pigeon Investment Management representation from Turley	Please see our response to Q10 above.	Comment noted.

## 12. Please let us know if you have any other comments.

Respondent	Summary of comments	Council response
Historic England	<p>Historic England welcome the inclusion of a section in the SPD on the historic environment.</p> <p>It is pointed out that listed buildings, buildings in conservation areas and scheduled monuments are exempt from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance and that special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. A link is provided to Historic England's guidance '<i>Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to Historically and Traditionally Constructed Buildings</i>' (2017).</p>	<p>A chapter on the historic environment has been included in the Draft SPD which largely refers to the detailed guidance in the Historic Environment Supplementary Planning Document which was adopted in June 2021.</p> <p>Reference to Building Regulations exemptions is noted, however as more detail is provided in the Historic Environment SPD it is not considered necessary to introduce this detail in this SPD.</p>
Broads Authority	<p>Suggestion to include reduction of light pollution, linked to reducing energy use.</p> <p>For large scale renewable energy developments the impact on the setting of the Broads must be considered. Early engagement with us on any schemes near to our boundary would also be appropriate.</p>	<p>Light pollution is covered in Chapter 8 on the Natural Environment and in Chapter 11 on Healthy Buildings and Places.</p> <p>Chapter 8 on the Natural Environment explains the policy approach to protecting the landscape of the Broads.</p>

Ipswich Borough Council	Ipswich Borough Council do not wish to comment at this time.	Comment noted
Westerfield Parish Council	Please to note the comprehensive proposals and look forward to consideration of the draft SPD.	Comment noted.
Water Management Alliance	Reference should be included to internal drainage boards and their role within planning process. A link is provided to the Water Management Alliance Planning and Byelaw Strategy.	Chapter 2 of the Draft SPD covers Water Efficiency and Management and provides a link to the strategy and guidance produced by the Lead Local Flood Authority which contains information on Internal Drainage Boards.
Natural England	Natural England does not have any comments to make on the Sustainable Construction SPD.	Comment noted
Anonymous Respondent 1	Any steps to mitigate future climate change problems should be introduced. If Building Regulations are not sufficient than any changes to planning to improve energy efficiency should be taken.	Policies SCLP9.2 and WLP8.28 in the Local Plans set policy for energy efficiency measures, in places going above the Building Regulation requirements. The SPD provides guidance on implementing these policies.
Anonymous Respondent 2	<p>Respondent supports:</p> <ul style="list-style-type: none"> <li>• a presumption that brownfield sites will be developed first;</li> <li>• refurbishment and retrofitting over demolition;</li> <li>• streets rather than cul-de-sacs;</li> <li>• green roofs;</li> <li>• rainwater recycling;</li> <li>• a presumption in favour of leaving and building around existing trees, hedges and ponds;</li> <li>• design for playing outside;</li> <li>• imaginative eco-design and traditional design;</li> </ul>	<p>The Local Plans allocate brownfield sites for development as part of a mixed approach which also involves greenfield development in acknowledgment of the limited scope for brownfield in a predominantly rural district.</p> <p>Chapter 3 on Material promotes reusing existing buildings over demolition.</p> <p>The Sustainable Development checklist in Appendix D of the Draft SPD sets out questions relating to sustainable travel.</p>

	<ul style="list-style-type: none"> <li>Hedgehog holes, swift boxes and similar and Wildlife-friendly landscape design;</li> </ul> <p>More community consultation and architectural solutions, defined by “commodity, firmness and delight”.</p>	<p>Water saving measures are set out in Chapter 2 on Water Efficiency and Management.</p> <p>Chapter 8 on the Natural Environment includes guidance on the provision of wildlife friendly features such as hedgehog holes and landscaping that is wildlife friendly.</p> <p>The Council will also be producing a Healthy Environments SPD which provides an opportunity to provide guidance on such topics as play space, and this forthcoming SPD is referenced in Chapter 11 on Healthy Buildings and Places.</p>
Anonymous Respondent 3	<p>All deciduous indigenous trees should be protected, so that they can only be felled in exceptional circumstances.</p> <p>Driveways should not be paved and artificial turf should not be used.</p>	<p>The benefits of trees are highlighted in the SPD such as in Chapter 8 on the Natural Environment, however the SPD cannot be used to amend legislation relating to the protection of trees.</p> <p>Permeable paving is supported in Chapter 2 on Water Efficiency and Management.</p> <p>Guidance discouraging artificial lawns is contained in Chapter 8 on the Natural Environment.</p>
Anonymous Respondent 4	<p>Concern raised over the impact on wildlife on the site when development takes place.</p>	<p>The Local Plans contain policies on the natural environment which seek to protect and enhance the natural environment and that seek net gains for biodiversity. Chapter 8 of the Draft SPD sets out guidance on incorporating measures into new development to better integrate nature into development.</p>

Anonymous Respondent 6	Comments that the majority of the cost of installing domestic PV panels is in the scaffolding and installation labour, and these should therefore be compulsory on new builds along with better insulation. Solar water heating should also be required. Air source heat pumps should be required rather than gas boilers. Net zero in Suffolk by 2030 will need these urgently.	The SPD cannot set new planning policies, above those set out in the Local Plan. However the SPD provides encouragement for installing renewable energy as part of complying with the policies on sustainable energy.
Anonymous Respondent 7	Comments that all developments should comply with zero-carbon construction and that renewable energy generation is long overdue.	The SPD cannot set new planning policies, above those set out in the Local Plan, however provides guidance on meeting the energy elements of the policies in the Local Plans and provides guidance to support renewable energy generation.
Anonymous Respondent 8	Comments that provision should be made for wildlife and suggests hedgehog tunnels/holes, wild-life friendly ponds, indigenous species of hedgerow, nesting sites and trees.  Comments that all construction should have solar panels.	Chapter 8 of the draft SPD relates to the Natural Environment and provides guidance on incorporating wildlife-friendly measures.  The SPD cannot set new planning policies, above those set out in the Local Plan, however provides guidance on meeting the energy elements of the policies in the Local Plans and provides guidance to support renewable energy generation.
Anonymous Respondent 9	Respondent submitted the following link to the 'Purple Turtle Co' blog: <a href="https://purpleturtleco.com/blogs/news/sustainable-cities-and-their-goals-for-the-future">https://purpleturtleco.com/blogs/news/sustainable-cities-and-their-goals-for-the-future</a>	Comment noted. The SPD is seeking to promote Sustainable Construction and help to ensure the implementation of the Council's policies on sustainable construction.
Peter Freer, Suffolk County Council	The County Council is pleased with the proposed content and supports its purpose.  The County Council notes that policies are often worded "Developers should consider" and recommends the wording	Support for the content is appreciated.  The Supplementary Planning Document cannot change the existing planning policy wording in the either Local Plans.

	<p>“Developers must implement,” but recognises that the council does not set Building Regulations for new houses.</p> <p>The County Council notes that heat networks form an important part of the government’s plan to reduce carbon and cut heating bills for customers. District heating is highlighted as an area for further consideration.</p>	Information on renewable and low carbon technologies and schemes is provided Chapter 9.
Pigeon Investment Management representation from Turley	Pigeon welcome the opportunity to comment on the proposed scope and structure of the Sustainable Design and Construction SPD and would welcome the opportunity to discuss these representations further with the Council in the form of a workshop where practicable.	Comment noted.
John Forbes	The respondent believes every new or altered property needs to have an on-site source of renewable energy sufficient to provide (possibly 50%) of its needs and that the LPA should adopt ideas without waiting for central government instruction.	<p>Local Planning authorities cannot seek to introduce planning policy requirements that exceed those permitted by National Planning Policy and Planning Policy Guidance.</p> <p>The Supplementary Planning Document cannot change the existing planning policy wording in the either Local Plans.</p>
Adrian Cooper, Felixstowe Community Nature Reserve	<p>Respondent supports:</p> <p>Hedgehog holes and tunnels for all fencing between all properties</p> <p>All open public green space areas having a wildlife-friendly pond</p> <p>All new buildings having roof-mounted PV panels (commercial and domestic)</p>	<p>Support for hedgehog hole in fences and green wildlife rich space is provided in Chapter 8 of the Draft SPD which relates to the Natural Environment.</p> <p>Planning Policy cannot required roof-mounted PV panels but support and information for PV panels is provided in Chapter 9.</p>

## Appendix 3: Initial Consultation Public Notices

Public Notice in the Lowestoft Journal and the Beccles and Bungay Journals published 19<sup>th</sup> March 2021

**EAST SUFFOLK COUNCIL**

East Suffolk Council is holding two public consultations from **Monday 15th March to 5pm Monday 26th April 2021** and welcomes all comments.

**East Suffolk Sustainable Construction Supplementary Planning Document (SPD)**

The Sustainable Construction SPD will provide guidance on a range of topics including energy efficiency, renewable energy, water conservation, sustainable transport and use of materials, to support the implementation of the Council's adopted Local Plan policies.

This preliminary consultation asks what information should be included in the SPD and a short questionnaire has been prepared. Once adopted the Sustainable Construction SPD will be a material consideration in the determination of planning applications.

**East Suffolk Community Infrastructure Levy (CIL) Charging Schedule**

A CIL Charging Schedule sets out the amount that certain kinds of development must pay to help contribute to the delivery of infrastructure in an area.

This initial consultation focuses on the basic viability/development cost assumptions, to help underpin the preparation of a Viability Report, which will be a key evidence base for the CIL Charging Schedule. The Council is also consulting on a draft East Suffolk CIL Instalments Policy.

**How to provide comments**

To view and respond to the consultation material, including supporting information, please visit **[www.eastsuffolk.gov.uk/planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)**. If you are unable to submit comments online you can email [planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk) or write to us at East Suffolk Council, Planning Policy and Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ.

If you are unable to view the consultation documents online, you may request a paper copy of the consultation documents and SPD questionnaire free of charge by contacting us via the contact details provided above.

Please note that if you wish to contact us via telephone (01502 523029), we are currently operating a voicemail service. Please leave a message including your contact details and your call will be returned as soon as possible.



**EASTSUFFOLK**  
COUNCIL

Public Notice in the East Anglian Daily Times, page 35 and East Daily Press, page 43 published 16<sup>th</sup> March 2021



East Suffolk Council is holding two public consultations from **Monday 15th March to 5pm Monday 26th April 2021** and welcomes all comments.

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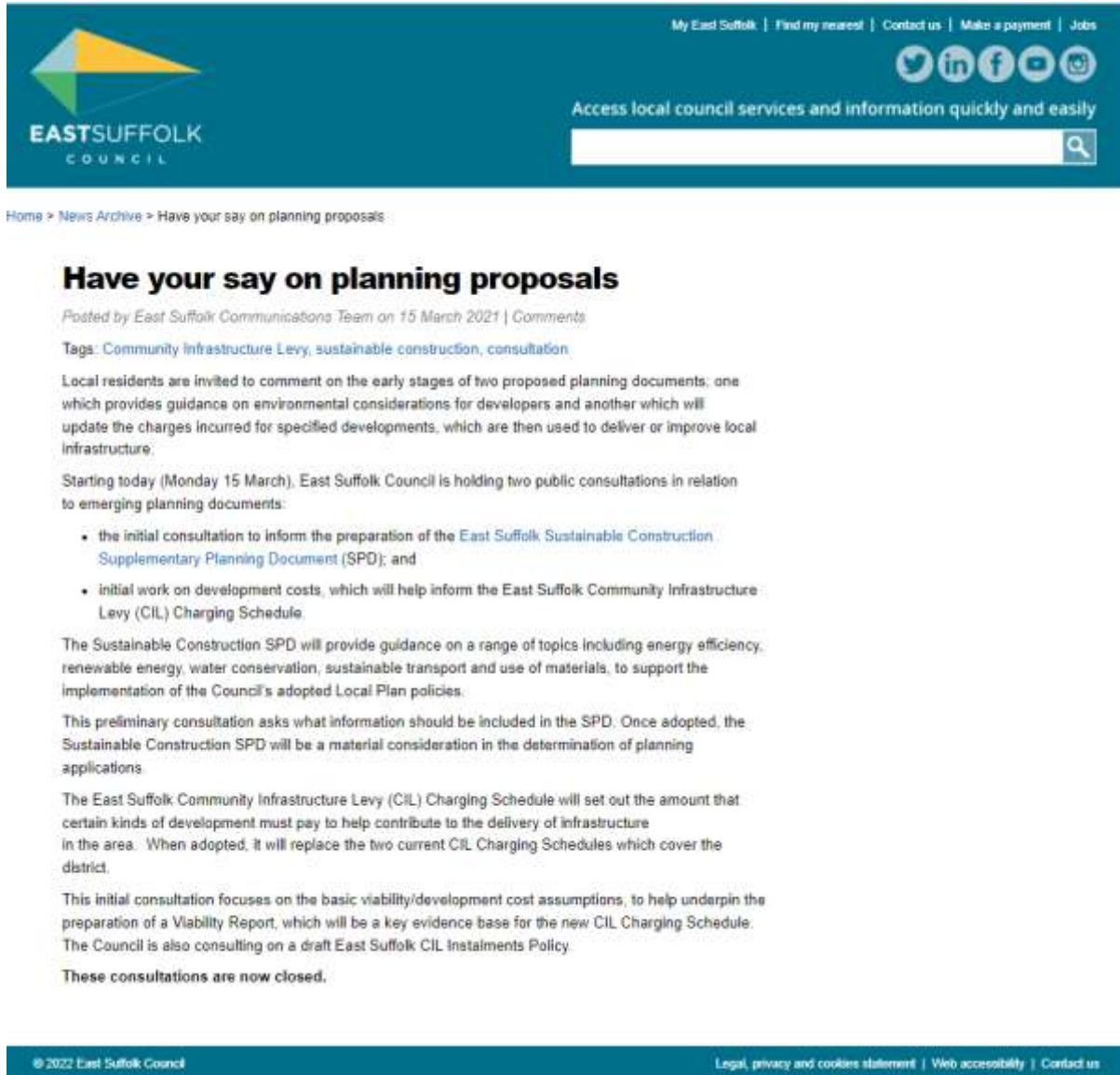
#### **How to provide comments**

To view and respond to the consultation material, including supporting information, please visit **[www.eastsuffolk.gov.uk/planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)**. If you are unable to submit comments online you can email **[planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk)** or write to us at East Suffolk Council, Planning Policy and Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ.

If you are unable to view the consultation documents online, you may request a paper copy of the consultation documents and SPD questionnaire free of charge by contacting us via the contact details provided above. Please note that if you wish to contact us via telephone 01502 523029, we are currently operating a voicemail service. Please leave a message including your contact details and your call will be returned as soon as possible.



## Appendix 4: Initial Consultation Press Release



The screenshot shows the East Suffolk Council website. At the top, there is a navigation bar with links: 'My East Suffolk', 'Find my nearest', 'Contact us', 'Make a payment', and 'Jobs'. Below this are social media icons for Twitter, LinkedIn, Facebook, YouTube, and Instagram. A search bar is also present with the text 'Access local council services and information quickly and easily'. The main content area has a breadcrumb trail: 'Home > News Archive > Have your say on planning proposals'. The title of the article is 'Have your say on planning proposals'. Below the title, it says 'Posted by East Suffolk Communications Team on 15 March 2021 | Comments'. The tags are 'Community Infrastructure Levy, sustainable construction, consultation'. The text of the press release follows, detailing the council's consultation on planning documents. It mentions that local residents are invited to comment on two proposed planning documents: one providing guidance on environmental considerations and another updating charges for specified developments. The consultation starts on Monday 15 March. The council is holding two public consultations: the initial consultation to inform the preparation of the East Suffolk Sustainable Construction Supplementary Planning Document (SPD) and initial work on development costs to help inform the East Suffolk Community Infrastructure Levy (CIL) Charging Schedule. The Sustainable Construction SPD will provide guidance on energy efficiency, renewable energy, water conservation, sustainable transport, and use of materials. The preliminary consultation asks what information should be included in the SPD. The East Suffolk Community Infrastructure Levy (CIL) Charging Schedule will set out the amount that certain kinds of development must pay to help contribute to the delivery of infrastructure in the area. This initial consultation focuses on the basic viability/development cost assumptions to help underpin the preparation of a Viability Report. The Council is also consulting on a draft East Suffolk CIL Instalments Policy. The press release concludes with 'These consultations are now closed.' The footer contains the copyright notice '© 2022 East Suffolk Council' and links for 'Legal, privacy and cookies statement', 'Web accessibility', and 'Contact us'.

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Home > News Archive > Have your say on planning proposals

### Have your say on planning proposals

Posted by East Suffolk Communications Team on 15 March 2021 | Comments

Tags: [Community Infrastructure Levy](#), [sustainable construction](#), [consultation](#)

Local residents are invited to comment on the early stages of two proposed planning documents; one which provides guidance on environmental considerations for developers and another which will update the charges incurred for specified developments, which are then used to deliver or improve local infrastructure.

Starting today (Monday 15 March), East Suffolk Council is holding two public consultations in relation to emerging planning documents:

- the initial consultation to inform the preparation of the [East Suffolk Sustainable Construction Supplementary Planning Document \(SPD\)](#); and
- initial work on development costs, which will help inform the [East Suffolk Community Infrastructure Levy \(CIL\) Charging Schedule](#).

The Sustainable Construction SPD will provide guidance on a range of topics including energy efficiency, renewable energy, water conservation, sustainable transport and use of materials, to support the implementation of the Council's adopted Local Plan policies.

This preliminary consultation asks what information should be included in the SPD. Once adopted, the Sustainable Construction SPD will be a material consideration in the determination of planning applications.

The East Suffolk Community Infrastructure Levy (CIL) Charging Schedule will set out the amount that certain kinds of development must pay to help contribute to the delivery of infrastructure in the area. When adopted, it will replace the two current CIL Charging Schedules which cover the district.

This initial consultation focuses on the basic viability/development cost assumptions, to help underpin the preparation of a Viability Report, which will be a key evidence base for the new CIL Charging Schedule. The Council is also consulting on a draft East Suffolk CIL Instalments Policy.

**These consultations are now closed.**

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Please note that links were live during the consultation period.

## Appendix 5: Initial Consultation on Social Media

Twitter – 15<sup>th</sup> March 2021



East Suffolk Council Planning  
@eastsuffolkplan



Have your say on the East Suffolk Sustainable Construction Supplementary Planning Document – consultation open until 26th April 2021.

[eastsuffolk.inconsult.uk/SustConSPD/con...](https://eastsuffolk.inconsult.uk/SustConSPD/con...)



4:19 pm · 15 Mar 2021 · Twitter Web App

## Twitter – 15<sup>th</sup> March & 25<sup>th</sup> March 2021

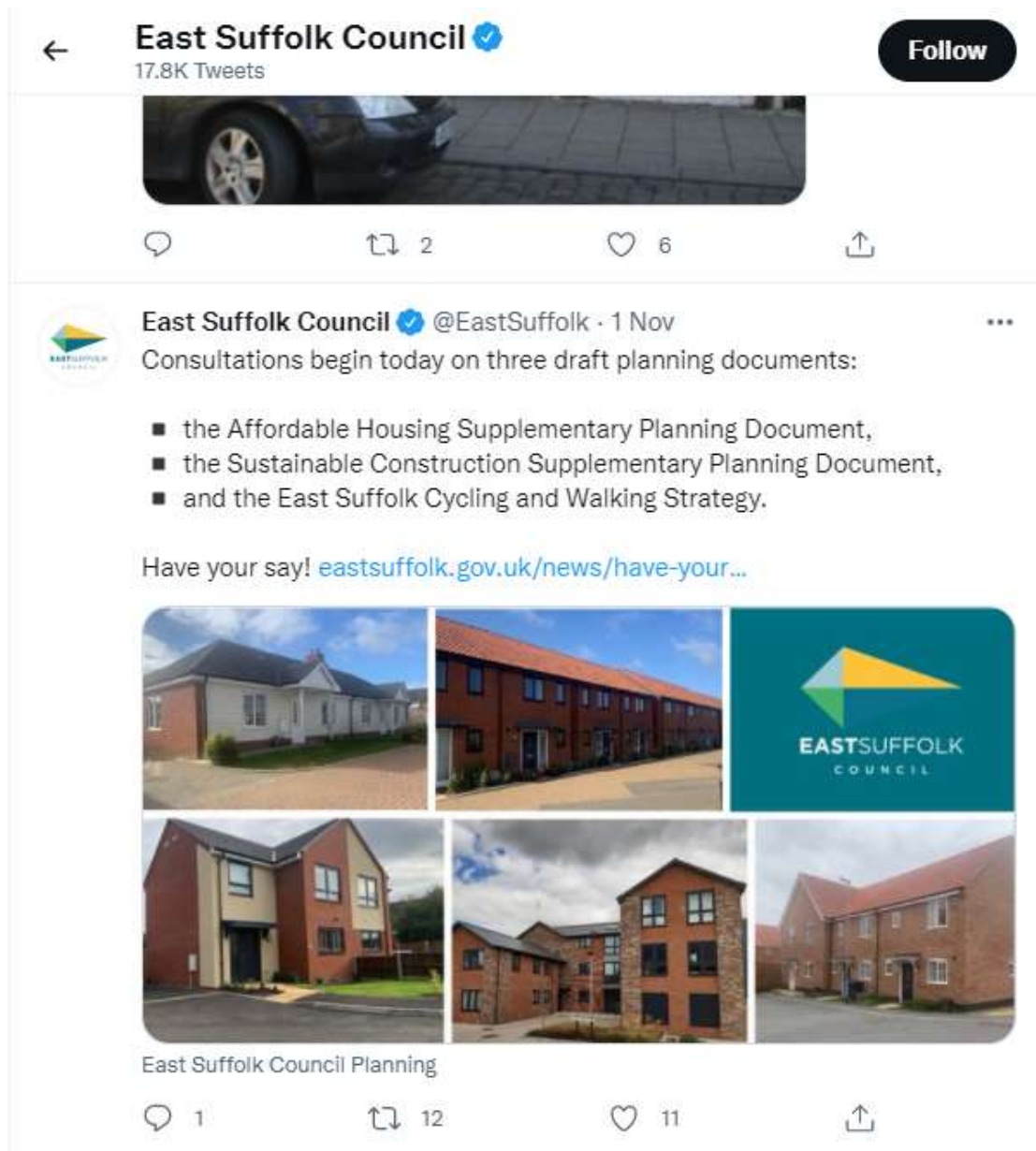


## Twitter – 22<sup>nd</sup> April 2021



## Appendix 6: Formal Consultation on Social Media

Twitter – 1<sup>st</sup> November 2021



Twitter – 22<sup>nd</sup> November 2021





Facebook – 24<sup>th</sup> November 2021

**East Suffolk Council**  
2 mins · 🌐

Have your say! 🗣️

Consultations on three draft planning documents are still open. You can comment on:

- the Affordable Housing Supplementary Planning Document,
- the Sustainable Construction Supplementary Planning Document,
- and the East Suffolk Cycling and Walking Strategy.

View the documents and comment at  
<https://www.eastsuffolk.gov.uk/.../planning-policy-consultat.../>



 Like     Comment     Share

[See all](#)

## Appendix 7: Formal Consultation Poster



# Have your say

### Draft Sustainable Construction Supplementary Planning Document

### Draft Affordable Housing Supplementary Planning Document

Consultation period  
1<sup>st</sup> November to 5pm 13<sup>th</sup> December 2021

### Draft Cycling and Walking Strategy

Consultation period  
1<sup>st</sup> November 2021 to 5pm 10<sup>th</sup> January 2022

#### What are we doing?

East Suffolk Council is in the process of preparing a new Sustainable Construction Supplementary Planning Document and a new Affordable Housing Supplementary Planning Document which will provide guidance to support the Council's planning policies on these matters.

We are also preparing a Cycling and Walking Strategy, which identifies potential cycling and walking infrastructure opportunities across the district.

#### How can you get involved?



**GIVE YOUR VIEWS**

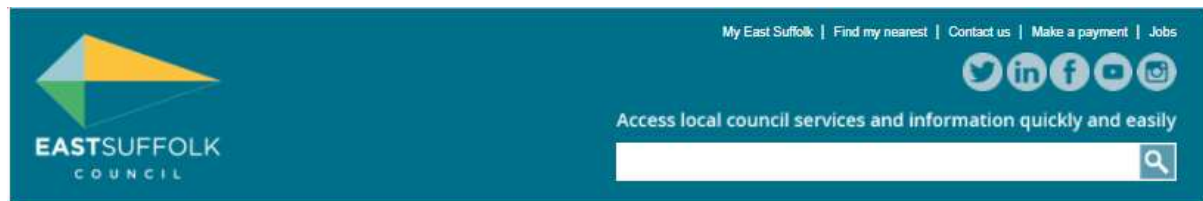
Visit the website below to view and comment on the draft documents. Hard copies of the three documents are also available to view in libraries and the Council's Customer Service Centres. Please contact us if you need any assistance in viewing the documents.

**Find out more and give your views:**  
[www.eastsuffolk.gov.uk/  
planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)

Alternatively, please send comments to:  
East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ.

✉ [planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk)  
☎ 01394 444557 / 01502 523029

## Appendix 8: Formal Consultation Press Release



[Home](#) > [News](#) > [Have your say on draft planning documents](#)

### Have your say on draft planning documents

Posted by on 1 November 2021 | [Comments](#)

Tags: [planning](#), [cycling](#), [environment](#)

East Suffolk residents are invited to have their say on three new planning documents covering affordable housing, sustainable construction and cycling and walking.

Consultations on three draft documents have launched today (Monday 1 November):

- the draft Affordable Housing Supplementary Planning Document
- the draft Sustainable Construction Supplementary Planning Document
- and the draft East Suffolk Cycling and Walking Strategy.

The Affordable Housing Supplementary Planning Document (SPD) will provide guidance on the implementation of East Suffolk Council's affordable housing planning policies. The draft SPD covers a range of matters including types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements, carrying out local housing need assessments and making planning applications.

**This consultation is now closed.**

The Sustainable Construction Supplementary Planning Document (SPD) will provide guidance on the Council's planning policies on sustainable construction, including guidance on a range of topics relating to the construction of environmentally sustainable buildings. Examples include increasing water efficiency in buildings, increasing energy efficiency and reducing carbon emissions from buildings, use of responsibly sourced and renewable materials, reducing construction waste, orienting buildings for solar gain, and using green infrastructure to increase biodiversity.

**This consultation is now closed.**

The draft [East Suffolk Cycling and Walking Strategy](#) provides a district-wide shortlist of cycling and walking infrastructure opportunities. The strategy aims to encourage greater use of sustainable forms of transport, reduce contributions to climate change, support the growth of the tourism industry, and to improve the health and wellbeing of residents by ensuring more trips to work, school, leisure, day-to-day errands, or public transport hubs, such as train stations or park and ride sites, are accessible by bike or on foot. Once adopted, this strategy will replace the Waveney Cycle Strategy (2016) and will cover the whole of the district.

Cllr David Ritchie, Cabinet Member for Planning and Coastal Management said: "We want to increase the opportunities for people to walk and cycle safely around the district, reducing reliance on vehicles, improving the environment, and benefiting people's health. Our Cycling and Walking Strategy sets out ways we can do this, and we would welcome any feedback on this and on the Supplementary Planning Documents which will enable us to make decisions on future developments."

**This consultation is now closed.**



Please note that links were live during the consultation period.



## Appendix 9: Summary of responses to consultation on the Draft SPD

### General Comments

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Water Management Alliance (Jessica Nobbs)	9	<p>The respondent provided information on the Internal Drainage District of the East Suffolk Internal Drainage Board and the Waveney, Lower Yare and Lothingland Internal Drainage Board. It also provided information on their role, their byelaws and adopted watercourses, and provided website links to maps of the respective catchment areas. The information included advice on legally discharging into watercourses, for proposals within 9m of a Board adopted watercourse, and proposals to alter a watercourse.</p> <p>The respondent added that they would support all new development incorporating water efficiency and water re-use measures, and support the policy approach that all major residential developments incorporate sustainable water management measures, such as SUDs.</p>	The information received and support for the Local Plans' sustainable construction policies is appreciated and has been noted. However, the guidance has not been added to the SPD as it was considered to be too detailed, and is better addressed on a case by case basis on relevant planning applications with the WMA notified and engaged with as a consultee.	No changes have been made to the SPD because of these comments.
Herries, Rupert	13	Concern raised over the validity of consultations due to the process related to the proposal for 70 dwellings on Chapel Field in Grundisburgh.	The respondent will have received the consultation email due to being registered on the planning policy mailing list. The comments raised are	No changes have been made to the SPD as a result of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			noted but are not related to the Sustainable Construction SPD.	
Natural England	14	<p>Support stated for the SPD.</p> <p>This SPD could incorporate features beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the NPPF. Consider providing guidance on bat roosts or bird boxes for example. An example of good practice is the Exeter Residential Design Guide SPD.</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community.</p> <p>Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments are useful tools for planners and developers</p> <p>Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p>	<p>The Exeter Residential Design SPD provides a wealth of detailed advice on the provision for biodiversity in new developments. The Sustainable Construction SPD has focused on energy reduction and carbon emissions in accordance with the requirements of policies SCLP9.2 and WLP8.28. The level of detail in the Exeter Residential Design SPD, whilst excellent, is not considered necessary or appropriate for this particular SPD.</p> <p>SEA Screening and Habitats Regulations Assessment Screening were undertaken for the SPD and concluded that a full SEA or HRA was not required. Natural England were consulted on the draft SEA and HRA Screening reports prior to the consultation on the Draft SPD and the final screening reports were published as part of the consultation on the Draft SPD.</p>	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		An SPD only requires an SEA in exceptional circumstances. While an SPD is unlikely to give rise to likely significant effects on European Sites, they should be considered a plan under Habitat Regulations. Should the plan be amended in a way that significantly affects its impact on the natural environment, Natural England wish to be consulted again.		
Westerfield Parish Council (Peter Miller)	15	No objection to the SPD.	Comment noted.	No changes have been made to the SPD because of these comments.
Broads Authority (Natalie Beal)	16	Support for the document given and request for reference to dark skies. (See detailed comment.)	It is agreed that the SPD should include reference to dark skies.	Chapter 6 amended to include reference to the Broads dark skies policy.
Felixstowe Town Council (Ash Tadjrishi)	31	The respondent has commented that they found the document to be very comprehensive but difficult to understand in conjunction with the Local Plans. The respondent also questioned the viability of the adopted optional water efficiency standard. The respondent also requested that paragraph 3.26 of the SPD is extended to cover permitted development rights.	The SPD has been drafted to make clear which policies of the Local Plans the guidance refers to throughout; where differences in policy approach varies between the equivalent policies of the Local Plans, this has been stated. The water efficiency optional standard is a requirement of planning policies SCLP9.2 and WLP8.28 and was viability tested during the development and examination of the Local Plans. It was calculated at the time of assessment to only cost an additional £9 per dwelling to meet the optional standard.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			Permitted development rights are covered lightly in the SPD where relevant (e.g. see Chapter 9 Renewable and Low Carbon Energy Schemes Table 6), reflecting their placement outside of planning control where no prior approval of set criteria is required.	
Hopkins Homes	32	It is important the SPD is clear it is not setting new building standards and policy requirements.	Comments noted.	No changes have been made to the SPD because of these comments.
Martlesham Parish Council (Debbie Chappell)	33	<ol style="list-style-type: none"> <li>1. East Suffolk should require solar panels on new buildings or require the building company to explain why they are not included.</li> <li>2. East Suffolk should require air source heat pumps instead of gas boilers or require the building company to explain why they are not included.</li> <li>3. East Suffolk should require a Carbon Construction Assessment to be made of 'embodied carbon' in line with EN 15978/ISO14044 and the RICS Whole Life Carbon Assessment for the Built Environment.</li> <li>4. Whether a building could be repurposed for alternative use should override any consideration of demolition.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Government's Planning Practice Guidance allows local planning authorities to "set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes." East Suffolk cannot require solar panels are installed on new buildings. Guidance on solar panels can be found in paragraphs 9.14-9.16.</li> <li>2. The type of heating system installed in a building is subject to Building Regulations. New Building Regulations are set to ban the installation of new gas and oil boilers in new homes from 2025. Guidance on air source heat pumps can be found in paragraphs 9.22 - 9.26.</li> </ol>	Support for the reuse of existing buildings provided in paragraph 5.2.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>3. The Government's Planning Practice Guidance on Climate Change states "The Written Ministerial Statement on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments. The statement sets out the government's expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix)." East Suffolk cannot require a Carbon Construction Assessment is carried out or certificate submitted. Support and guidance on reducing carbon emissions can be found in chapter 3.</p> <p>4. Changes have been made to strengthen support for the reuse of existing buildings where possibly in paragraphs 5.2</p>	
Lowestoft Town Council (Sarah Foote)	34	<p>Use Swift Bricks in all new builds of more than one storey.</p> <p>There is no mention of renovation which is recommended by Historic England to reduce carbon emissions</p>	<p>The recommendations regarding swift bricks and information on renovations is accepted and changes proposed to incorporate the comments. Comments regarding Sizewell are</p>	<p>The text in Chapter 8 has been strengthened to give support for integrating bird boxes into buildings including for swifts. Links to Historic England's</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Sizewell C is not 'advanced' in nuclear energy terms.</p> <p>Why is waste taken to Ipswich as this cannot be a good way to reduce carbon emissions with the distance of travel involved.</p>	<p>noted.</p> <p>This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. Local Plan policies SCLP9.2 and WLP8.28 are focused on new developments. Guidance in the SPD aims to help reduce construction waste and the associated carbon emissions from new developments.</p>	<p>guidance on renovating historic buildings and improving energy efficiency has been added into Chapter 7.</p>
Chris Rogers	35	<p>Hasn't seen anything in the SPD about unnecessary demolition. Provided links to information on building demolition/reuse.</p> <p>Commented on Planning Application DC/20/0902/OUT for the Police HQ site at Martlesham.</p>	<p>Chapter 4 paragraph 4.1 recommends reusing existing buildings, but the text can be strengthened.</p>	<p>Additional text has been added to chapter 5 Waste to emphasise the importance of reusing buildings.</p>
National Grid Ventures	43	<p>Agents on behalf of the National Grid Ventures recommend that section 10 Construction Methods and Standards includes references to and recommends the use of CEEQUAL sustainability tools and assessments methods.</p>	<p>It is agreed that the SPD should include references to and recommend the use of CEEQUAL in chapter 10.</p>	<p>A new section on CEEQUAL has been added to chapter 10 Construction Methods and Standards. New paragraphs provide information and links regarding CEEQUAL and recommend use of the scheme to achieve the highest possible sustainability standards.</p>

<b>Name/ Organisation</b>	<b>Comment ID / Ref</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Historic England (Marsh, Andrew)	44	Welcome the production of the Supplementary Planning Document, but do not currently have capacity to provide detailed comments.	Comments noted.	No changes have been made to the SPD because of these comments.
Defence Infrastructure Organisation (Chris Waldron)	47	The MOD want to be consulted regarding any potential development within the Aerodrome Height safeguarding zones surrounding Wattisham Airfield which consists of structures or buildings exceeding 91.4M Above Ground Level or any development within the statutory safeguarding zones that surround the East 2 WAM Network.	Comments noted. East Suffolk will endeavour to continue to consult the MOD on all relevant planning applications.	No changes have been made to the SPD because of these comments.
Pigeon Investment Management Ltd (Fillmore, Andrew)	48	<p>Pigeon support the Council's general approach set out in the SPD, but these ambitions need to be balanced against housing delivery requirements. Not enough emphasis is placed on addressing existing housing stock. Paragraphs 3.24 and 3.25 don't provide any guidance or encourage for improving energy efficiency in existing housing. The SPD fails to recognise the role of Building Regulations in ensuring standards for energy efficiency and strongly recommends that such matters should be controlled through Building Regulations rather than local planning policy/ guidance.</p> <p>Welcome the opportunity to comment</p>	<p>Paragraphs 3.24 and 3.25 provide limited information regarding retrofitting existing buildings as this work generally sits outside the planning systems. This SPD aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies and the existing policies only address new development.</p> <p>The role of Building Regulations is acknowledged in paragraph 1.22 and the future changes to Building Regulations are referenced in</p>	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>on draft conditions but emphasises these are best secured at Reserved Matters stage when greater detail of a scheme is known.</p> <p>It is noted that certain criteria in the checklist will not apply to outline planning applications and requirements will vary depending on the scale of the scheme. The use of a 'one size fits all' approach is inappropriate.</p>	<p>paragraph 12.28. Whilst the setting of Building Regulations are not within the control of the Council, Local Planning Authorities can set energy performance standards for new housing that are higher than building regulations, but only up to the equivalent of Level 4 of the, now withdrawn, Code for Sustainable Homes (this is approximately 20% above current Building Regulations) and this is explained in paragraph 1.32. This requirement is part of policy SCLP9.2 in the adopted Suffolk Coastal Local Plan. The SPD also seeks to encourage developers to exceed the energy efficiency standards set out in Building Regulations wherever possible.</p> <p>The Sustainable Development checklist in Appendix D aims to be flexible. It is acknowledged that the list is not exhaustive and will not apply to all schemes or stages of a development.</p>	



## 1 Introduction

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saul D Humphrey (Saul Humphrey)	1	Recommends immediately adopting the Future Home Standard now to have a single, simple, cost, effective national standard that avoid numerous local alternatives. Also recommends lobbying central Government to revise the Future Home Standard to ensure embodied carbon is reduced.	The Future Home Standard proposes changes to Building Regulations that are due to be introduced in June 2022. East Suffolk Council does not have the authority to adopt the Future Homes Standard now before it is introduced by the Government. This Supplementary Planning Document aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans.	No changes have been to the SPD because of these comments.
Martin Minta	2	Wants robust and immediate requirements for all new buildings, information on grant funding to convert buildings, and disagrees with the inclusion of reference to nuclear energy.	<p>This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies.</p> <p>Comments regarding Government grant funding are noted, but grant options vary overtime. The Council has also produced an Environmental Guidance Note which can be more easily updated/amended than an SPD. The Environmental Guidance Note could therefore be a better place to provide information about government grants. The Environmental Guidance Note is available here:  <a href="http://www.eastsuffolk.gov.uk/environment/environmental-guidance-note/">www.eastsuffolk.gov.uk/environment/environmental-guidance-note/</a></p>	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			Nuclear power is present in East Suffolk. The SPD only refers to nuclear power as being part of the Government's Ten Point Plan for a Green Industrial Revolution.	
David Beavan (East Suffolk Councillor)	3	The reuse of old frames and concrete pads should be the default position with structural surveys required to justify demolition. Builders should be encouraged to provide community skips where people can source used materials. Care should be taken when building near floodplains.	Chapter 4 Materials and chapter 5 Waste aim to emphasise the importance of reusing and recycling buildings and materials.	Additional text has been added to chapters 5 to emphasise the importance of reusing and recycling buildings and materials.
David George	8	Finds the text on carbon footprint weak and cannot see any mandates regarding solar PV generation.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies or mandate the use of solar panels.	No changes have been made to the SPD because of these comments.
Sally Hopper	10	The SPD needs to be stronger and mandate standards for development including on 1) renewable energy systems, 2) LED lighting, 3) environmentally friendly concrete (e.g. as made by Novacem, and others), 4) low emission paint. The SPD should promote more low carbon materials. The document is of zero value as developers will ignore it.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies or mandate requirements for renewable energy. However, a new paragraph 4.6 has been added that supports new products and materials.	Additional text has been added to chapter 4 Materials regarding lighting, concrete, paint and low carbon materials.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Sally Hopper	11	<p>1. Doesn't understand why the Suffolk Coastal and Waveney Local Plan policies are different and wants them better aligned.</p> <p>2. Want the SPD to set requirements using the words 'should' or 'are expected to'.</p> <p>3. Requests '10' in SCLP9.2 is defined, is this 10 occupants, 10 garages, 10 dwellings?</p> <p>4. Wants SCLP9.2 to apply to all new development not just residential developments of more than 10.</p> <p>5. Wants SCLP9.2 to be more ambitious than 20%.</p>	<p>1. East Suffolk has two Local Plans and the northern area of the district falls within the Broads Authority who have their own Local Plan. The three Local Plans were developed and adopted at different times using different evidence. The Suffolk Coastal Local Plan policy SCLP9.2 Sustainable Construction and Waveney Local Plan policy WLP8.27 Sustainable Construction are very similar policies that seek through different approaches to mitigate the impact of construction on climate change through a comprehensive sustainable construction approach that includes higher water and energy efficiency standards.</p> <p>2. This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies and this is reflected in the language used in the SPD.</p> <p>3. The first paragraph of policy SCLP9.2 relates to development of 10 or more dwellings.</p> <p>4. As mentioned above an SPD cannot set new planning policies or change existing planning policies.</p> <p>5. The energy efficiency of new houses is covered by Building Regulations. The setting of Building Regulations are not within the control of the Council. Local Planning Authorities can set energy performance standards for new housing that are</p>	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			higher than building regulations, but only up to the equivalent of Level 4 of the, now withdrawn, Code for Sustainable Homes (this is approximately 20% above current Building Regulations).	
Sally Hopper	12	<p>6. Explain paragraph 1.22 and why the 20% limit in policy SCLP9.2 exists.</p> <p>7. Explain paragraph 1.29 and the targets for installing heat pumps and changes to Building Regulation Standards. It is not clear whether this is a target for our region, or something else.</p> <p>8. Explain paragraph 1.29 regarding homes being 'zero carbon ready' and whether it conflicts with paragraph 1.22.</p>	<p>6. The reason for the 20% limit in policy SCLP9.2 is explained in Chapter 1 of the SPD. The setting of Building Regulations are not within the control of the Council.</p> <p>7. The SPD is clear that the targets and proposed changes to Building Regulation Standards are national targets and standards set by the Government.</p> <p>8. The Government is proposing to achieve the targets and standards set out paragraph 1.29 through a variety of measures including changes to Building Regulations.</p>	Text in paragraph 1.29 has been amended to provide greater clarity.
Reydon Parish Council (Fiona Taylor)	26	Reydon Parish Council supports the SPD.	Comments noted.	No changes have been made to the SPD because of these comments.
Elizabeth Newton	30	<p>The document is clear, accurate, informative and well written. More work needs to be done to advertise the document and promote it widely.</p> <p>The Council's aim in committing to sustainable construction needs to be made BIG and public and visible. Recommends publicising it in the East Suffolk Council household</p>	Comments noted. It is not intended that the SPD will be regularly reviewed given that it accompanies the adopted Local Plan. The Council has however also produced an Environmental Guidance Note that can be updated more regularly.	No changes have been to the SPD because of these comments, but further consideration will be given to methods of advertising and promoting the document. Once adopted the SPD will be publicised including on social media.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>leaflet.</p> <p>The chapters on materials and energy are particularly helpful. The document supports the development of sustainable construction. Acknowledges the challenge of getting the information read and understand so it can influence construction.</p> <p>The suggestions that an energy nominated advisor is appointed is particularly important. Need to keep the SPD updated regularly. Examples/contacts of energy advisors may be helpful as would links to existing sustainable projects.</p>		
Suffolk Preservation Society (Bethany Philbedge)	36	<p>Reference should be made to the RIBA2030 Challenge Targets (May 2021). See also GLA Whole Life Carbon Policy Guidance SI2 for Benchmarks.</p> <p>The Environmental Audit Select Committee on Whole Life Carbon in July 2021, the UKGBC stated that “Constructing a new build constitutes the bulk of the carbon emissions, and in some cases accounts for 50% of a new building’s whole life cycle impact.”</p>	<p>The recommendations are accepted and changes proposed to incorporate the comments.</p> <p>The heat pump targets referred to paragraph 1.29 have been set by the Government in the Ten Point Plan for a Green Industrial Revolution. Target emission rates are set out in Building Regulations.</p> <p>East Suffolk Council cannot set Building Regulations and paragraph 1.32 explains Local Plans are only able to set higher energy efficiency standards, where these are no higher than the equivalent of Level 4 of the Code for Sustainable</p>	<p>A new sentence has been added to paragraph 1.29 noting that the Government’s Ten Point Plan for a Green Industrial Revolution and the Future Homes Standard focus on operational not embodied carbon. Reference to the RIBA 2030 Climate Challenge added to paragraph 3.12.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Retrofit should be prioritised over new build.</p> <p>New builds should include an assessment and explanation as to how the project will perform in the future in relation to climate change and meet the highest current standards.</p> <p>1.27: It is important to note the Future Homes Standard does not cover all carbon emissions (specifically embodied emissions) and is therefore not covering the full 'Net Zero' requirement.</p> <p>1.28: The same is true of the 'Ten Point Plan for a Green Industrial Revolution' which also does not encompass embodied emissions.</p> <p>1.29: refers heat pumps targets but there is no requirement to examine the carbon cost of this or any plans to mitigate the embodied carbon.</p> <p>This should be a requirement in local policy.</p>	Homes, which equates to approximately 20% above the Target Emission Rate for CO <sub>2</sub> as set in the 2013 Edition of the 2010 Building Regulations.	
Ipswich and East Suffolk Clinical Commissioning Group	45	The CCG recommend that references to BREEAM note that achieving the 'Very Good' Standard does not result in net zero. The CCG notes UK Green Building Council (UKGBC has developed a 'Net Zero Carbon Buildings; A Framework	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies or add requirements relating to other building	References to BREEAM Very Good standard not resulting in net zero has been added to paragraph 10.28. Links added to Building Back Better with BREEAM and Net Zero

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Definition' Net Zero Carbon Buildings: A Framework Definition - UKGBC - UK Green Building Council in 2019 in an attempt to bridge the gap between 'good' and 'net zero'. Notes that BREEAM is evaluating how this can be tackled in Building Back Better: Net zero carbon and BREEAM - Designing Buildings working in partnership.</p> <p>The CCG recommends the local authority planning policies have greater flexibility in future to allow for wider consideration than just BREEAM and references to achieving net zero. Recognition should be given to other guides and examples. Should recognise design that improves health in addition to addressing carbon emissions. Need more consideration of green spaces and places as an integral part of developments, so that building design/performance that tackles net zero carbon also includes reference to green spaces and places noting the health benefits. The CCG recommends that offsetting of carbon is actively discouraged.</p>	standards. However, the SPD can provide further guidance and links as suggested.	Carbon and BREEAM added in chapter 10 on BREEAM.

## 2 Water Efficiency and Management

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
David Beavan (East Suffolk Councillor)	4	Supports guidance on flooding. States reservoirs should be funded by CIL.	Larger reservoirs are operated and managed by water companies and any new such reservoirs need very careful consideration (technical, planning and licensing). Any necessary funding is normally secured through the five-yearly Asset Management Planning process that water companies need to go through with Ofwat, with the cost of improvements etc. in essence paid for through water bills. There is therefore not a formal role for spending CIL monies on such infrastructure.	No changes have been made to the SPD because of these comments.
Broads Authority (Natalie Beal)	17	The presentation of information in Table 3 needs to be made clearer and more accessible, particularly in relation to guidance on dishwashers, washing machines and bath tubs.	It is agreed that the information presented in Table 3 could have been clearer, and so amendments to the text and the addition of footnotes to aid interpretation of this information have been added.	Table 3's text has been clarified and footnotes added to aid interpretation of the information presented. Various amendments have also been made to the text of Chapter 2 to make the context of Table 3 clearer.
Reydon Parish Council (Fiona Taylor)	27	Respondent supports the guidance included in the SPD relating to water efficiency and management.	Support noted.	No changes have been made to the SPD because of these comments.
Ipswich and East Suffolk Clinical Commissionin g Group	46	The Ipswich and East Suffolk Clinical Commissioning Group have advised that NHS England has taken the policy stance to not fund or accept Section 106 or CIL contributions towards the extension or	This information is helpful to the Council from an infrastructure planning perspective, though is not appropriate for inclusion in the Sustainable Construction SPD and therefore will not be included in the guidance.	No changes have been made to the SPD because of these comments.



Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		creation of new healthcare facilities in flood risk areas.		

### 3 Energy Efficiency and Carbon Reduction

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
David Beavan (East Suffolk Councillor)	5	Wants paragraph 3.6 to be worded stronger. Wants the retention and reuse of existing buildings to be the default position and new buildings to be built to last.	Chapter 4 Materials and chapter 5 Waste both emphasise the importance of reusing buildings and chapter 11 Healthy Buildings and Places emphasises the importance of building to last.	Additional text has been added to chapters 5 to emphasize the importance of building to last.
Reydon Parish Council (Fiona Taylor)	28	Reydon Parish Council fully supports requirements for the reduction of energy use in building design and for more efficient energy use in the building itself.	Comments noted.	No changes have been made to the SPD because of these comments.
Suffolk Preservation Society (Bethany Philbedge)	37	Chapter 3 should require specific requirements and targets. (See Greater London Authority Plan Policy SI2 for the detailed guidance, and benchmarks, which are aligned with Royal Institute of British Architecture 2030 and London Energy Transformation Initiative Targets.) All assessments for external infrastructure should include a carbon assessment.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD cannot set new planning policies, specific requirements or targets.  Retrofit works generally sit outside the planning system. Local Plan policies SCLP9.2 and	Paragraph 3.9, 3.13 and 3.14 have been amended to provide greater clarity.  Reference to RIBA 2030 Climate Challenge added into paragraph 3.12.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>There should be detailed guidance on retrofitting existing buildings.</p> <p>Paragraph 3.9 is very misleading. This is because there are whole life carbon emissions that this statement does not cover, such as processing recycled material, construction processes, and in use repair and maintenance.</p> <p>Paragraph 3.13: It should be noted that the RCIS Whole Life Carbon assessment is the overarching assessment methodology (due to be upgraded by Summer 2022) for carbon assessment across the UK, whereas the 'Net Zero Carbon Toolkit' and the 'Climate Emergency Design Guide' are design guides that refer back to the RICS methodology.</p>	<p>WLP8.28 both relate to new developments not the retrofitting of existing buildings. It is agreed that paragraph 3.9 and 3.13 could be clearer and changes have been made in response to the comments.</p>	

## 4 Materials

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	18	<p>Support for the emphasis on re-using existing buildings/ materials and a recognition of the embodied energy they retain.</p> <p>Recommend amending paragraph 3.12 or 3.25 to include reference to Historic England and Sustainable Traditional Buildings Alliance guidance.</p> <p>Recommend altering the start of paragraph 3.7.</p> <p>Notes the image on page 36 on Glass has a glazed façade that would result in light pollution. A caveat is suggested for the section that mentions the Broads has intrinsic dark skies protected through the NPPF.</p>	The recommendations for additional information are accepted and changes proposed to incorporate the comments.	Links to Historic England and Sustainable Traditional Buildings Alliance guidance have been added to chapter 7. Reference has been added to Chapter 6 that mentions the Broads has intrinsic dark skies.
Suffolk Preservation Society (Bethany Philbidge)	38	Suffolk Preservation Society consider a requirement should be added for a RICS Whole Life Carbon assessment to be carried out for each construction project whether new build or retrofit.	The Local Planning Authority cannot set a policy requirement for a RICS Whole Life Carbon assessment to be carried out. This Supplementary Planning Document builds upon and provides more detailed advice to support planning policy SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan (2020) and WLP8.28 Sustainable Construction	A RICS Whole Life Carbon assessment for the built environment is recommended in paragraph 3.13 of the chapter on Energy Efficiency and Carbon Reduction. Additional references recommending and promoting

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			in the Waveney Local Plan (2019), but it cannot introduce new planning policies or requirements into the plan.	the use of a RICS Whole Life Carbon assessment have been added to paragraph 4.3 of the chapter on Materials and to the Sustainable development checklist in Appendix D.

## 5 Waste

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	20	Typo in paragraph in 5.2 noted.	Comment noted.	Typo corrected.
Suffolk Preservation Society (Bethany Philbidge)	39	The carbon impacts of waste and waste disposal should be included in any assessment.	It is agreed that the carbon emissions from waste and waste disposal could be included in any building assessment, but it is not a requirement of policy SCLP9.2. The purpose of a Supplementary Planning Document is to provide more detailed advice or guidance on policies in the Local Plans. Supplementary Planning Documents do not set planning policy.	A sentence has been added to paragraph 5.3 stating carbon emissions from waste and waste disposal should be considered and included in whole life carbon assessments of a building.

## 6 Siting, Form and Orientation

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	21	It is suggested that paragraph 6.6 refers to the fact that the Broads has intrinsic dark skies protected through the NPPF.	The recommendations are accepted and changes proposed to incorporate the comments.	Chapter 6 has been amended to include reference to the Broads dark skies policy.

## 7 Sustainable Energy and Construction and the Historic Environment

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	19	Suggested that Table 3 on page 48 highlights the need for retrofitting to consider damp/ condensation and provide links to Historic England documents.	The recommendations are accepted, and changes proposed to incorporate the comments.	Table 3 has been amended as suggested and links to Historic England documents added to chapter 7.
Suffolk Preservation Society (Bethany Philbidge)	40	There needs to be better guidance and signposting to guidance on retrofitting historic buildings including support for direct contact with Historic England and use of whole life carbon assessments. The limiting of permitted development should include sustainable/net zero requirements.	It is agreed that further guidance and signposting to Historic England's guidance could be provided.  The Local Planning Authority could use Article 4 directions to restrict the scope of permitted development rights either in relation to a particular area, or a particular type of development. However, the purpose of a Supplementary Planning Document is to provide more detailed advice or guidance on policies in the Local Plans. Supplementary Planning Documents do not set planning policy.	Additional information and links to Historic England's technical guidance has been provided in chapter 7, together with advice that historic buildings should use whole life carbon assessments.

## 8 Natural Environment

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
David Beavan (East Suffolk Councillor)	6	The height of solar panels on solar farms should be regulated better to minimise their impact of the landscape.	Additional information and advice regarding the height of solar panels and their impact on the landscape can be provided in the section on Photovoltaics (PV) in chapter 9.	Additional information and advice regarding the height of solar panels and their impact on the landscape provided in the section on Photovoltaics (PV) in chapter 9.
Trimley St Martin Parish Council, (Caroline Ley)	24	Typo in paragraph 8.6 noted.	Comment noted.	Typo corrected.
Reydon Parish Council (Fiona Taylor)	29	Reydon Parish Council is keen to support policies that aim to support wildlife and achieve biodiversity gain.	Comments noted.	No changes have been made to the SPD because of these comments.

## 9 Renewable and Low Carbon Energy schemes

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	22	Section 9 – this should refer to impact on the setting of the Broads as well as the Broads landscape sensitivity study.	The recommendations are accepted and changes proposed to incorporate the comments.	A new paragraph 8.4 has been added in Chapter 8 Natural Environment that refers to the Broads Authority setting and Broads Landscape Sensitivity Study for renewable and Infrastructure.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Trimley St Martin Parish Council, (Caroline Ley)	25	Requested more guidance on collective, community-based solutions into which parish councils can play an active role.	<p>This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. Local Plan policies SCLP9.2 and WLP8.28 are focused on new developments.</p> <p>It is acknowledged that Parish Councils may want more guidance so they can play an active role in mitigating climate change. Parish Councils can use the information within the SPD to improve buildings they own and run such as villages halls, and community heating systems can be used to supply renewable or low carbon heating to a relatively small development.</p>	No changes have been made to the SPD because of these comments.
Suffolk Preservation Society (Bethany Philbedge)	41	<p>Schemes using low carbon or passive measures should assess embodied carbon against operational carbon benefit. A fabric first approach should be part of the assessment.</p> <p>Where Permitted Development Rights can be restricted, environmental and sustainable (Net Zero) requirements should be included where possible.</p>	<p>Paragraphs 3.12 and 3.13 provide information on recognised approaches for calculating and reducing carbon, and paragraph 3.14 promotes the use of the Energy Hierarchy and fabric first approach.</p> <p>The Local Planning Authority could use Article 4 directions to restrict the scope of permitted development rights either in relation to a particular area, or a particular type of development. However, the purpose of a Supplementary Planning Document is to provide more detailed advice or guidance on policies in the Local Plans. Supplementary Planning Documents do not set planning policy.</p>	No changes have been made to the SPD because of these comments.

## 10 Construction Methods & Standards

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Suffolk Preservation Society (Bethany Philbidge)	42	All construction methods proposed should be assessed using the RICS Whole Life Carbon assessment methodology. A BREEAM MAT 01 assessment doesn't cover the full scope of the RICS Whole Life Carbon assessment, however there is no conflict between these requirements. Passivhaus or EnerPhit projects would also benefit from RICS Whole Life Carbon assessments to reveal the overall efficiency.	The RICS Whole Life Carbon assessment is supported in paragraph 3.13, but the SPD would benefit from reference to it in Chapter 10.	Reference to RICS Whole Life Carbon assessment added into chapter 10.

## 12 Making a Planning Application

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
David Beavan (East Suffolk Councillor)	7	Developers should not be allowed to use viability to avoid environmental constraints and considerations when they have paid too much for a site.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan and WLP8.28 Sustainable Construction in the Waveney Local Plans. The SPD doesn't address site specific viability issues. The policies in the Local Plans were subject to viability assessments. If viability is an issue with a specific planning application/ site, it is the responsibility of the	No changes have been made to the SPD because of these comments.



<b>Name/ Organisation</b>	<b>Comment ID / Ref</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
			applicant to submit sufficient and satisfactory information to the Local Planning Authority.	

## Appendix A - Evidence Base & Further Guidance

<b>Name/ Organisation</b>	<b>Comment ID / Ref</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Broads Authority (Natalie Beal)	23	In Appendix A please add reference to the Sustainable Traditional Building Alliance guidance in the 'Further Guidance' list.	The recommendation is accepted.	Appendix A has been amended with reference to the STBA guidance added to the 'Further Guidance' list.

## Appendix B - Sustainability Statement TER Template

<b>Name/ Organisation</b>	<b>Comment ID / Ref</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Pigeon Investment Management Ltd (Fillmore, Andrew)	49	The level of information required by the Sustainability Statement Target Emission Rate (TER) Template in Appendix B is inappropriate for outline applications and may encourage standardised house types and disadvantage SME home builders.	Policy SCLP9.2 in the Suffolk Coastal Local Plan requires information on TER to be submitted. This SPD is not requiring additional information. The template in Appendix B is designed to simply and standardise the presentation of TER information so Planning Officers can easily check compliance with policy SCLP9.2.	Additional text has been added in Appendix B to clarify that the information may not be required at outline planning application stage.

## Appendix C - Standard Condition wording

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd (Fillmore, Andrew)	50	Considers the standard planning condition wording for water efficiency confusing because it could be applied to Outline and/or reserved matters stage. Recommends it only applies at Reserved Matters stage. As the condition relates solely to water efficiency, requirements relating to energy efficiency measures should be removed.	The recommendations are accepted and changes proposed to incorporate the comments.	The wording has been changed so the condition simply applies to residential development
Pigeon Investment Management Ltd (Fillmore, Andrew)	51	Standard Planning Condition wording for a Sustainability Statement for Outline Planning Applications for residential developments of 10 or more dwellings or commercial schemes of 1,000sqm or more floorspace in the former Waveney area. – Pigeon generally supports the condition but recommends that a Sustainability Statement should only be required for Reserved Matters applications for appearance of the building and not required for layout, landscaping or access matter.  Standard Planning Condition	The recommendations are accepted and changes proposed to incorporate the comments.	Standard Planning Condition wording for a Sustainability Statement for Outline Planning Applications for residential developments of 10 or more dwellings or commercial schemes of 1,000sqm or more floorspace in the former Waveney area. – Text amended so the condition details requested concurrent with the first reserved matter applications.  Standard Planning Condition wording for a Sustainability Statement for Planning Applications and Reserved

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>wording for a Sustainability Statement for Planning Applications and Reserved Matters for residential developments of 10 or more dwellings or commercial schemes of 1,000sqm or more floorspace in the former Waveney area. –</p> <p>Pigeon finds it unclear what level of information is required to discharge the condition and requests further guidance and examples in the document.</p> <p>Standard Planning Condition wording for Energy Statements (including 20% reduction in CO2 emissions) for Outline Planning Applications in the former Suffolk Coastal area. –</p> <p>Pigeon support the requirement for more detailed information to be required at Reserved Matters stage, but caution such information should only be required for matters relating to appearance. Appendix D of the SPD should be updated to clarify the level of information required and include relevant examples.</p>		<p>Matters for residential developments of 10 or more dwellings or commercial schemes of 1,000sqm or more floorspace in the former Waveney area. – Condition removed from SPD.</p> <p>Standard Planning Condition wording for Energy Statements (including 20% reduction in CO2 emissions) for Outline Planning Applications in the former Suffolk Coastal area. – Text amended requiring measures to be implemented in accordance with approved statement.</p> <p>Standard Planning Condition wording for Energy Statements (including 20% reduction in CO2 emissions) for Full Planning Applications and Reserved Matters in the former Suffolk Coastal area. – Text amended requiring measures to be implemented in accordance with approved statement.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Standard Planning Condition wording for Energy Statements (including 20% reduction in CO2 emissions) for Full Planning Applications and Reserved Matters in the former Suffolk Coastal area. –</p> <p>No objection from Pigeon.</p> <p>Standard Planning Condition wording for BREEAM Certification for Outline Planning Applications. –</p> <p>Pigeon supports the aim of this condition but would caution that such information should only be required when matters relating to appearance are being sought. Appendix D of the SPD should be updated to clarify the level of information required and include relevant examples.</p> <p>Standard Planning Condition wording for BREEAM Certification for Full Planning Applications and Reserved Matters. –</p> <p>No objection from Pigeon.</p> <p>Standard Planning Condition wording for M4(2) Homes for Outline Planning Applications for</p>		<p>Standard Planning Condition wording for BREEAM Certification for Outline Planning Applications. –</p> <p>No changes made to this condition wording.</p> <p>Standard Planning Condition wording for BREEAM Certification for Full Planning Applications and Reserved Matters. –</p> <p>Condition kept.</p> <p>Standard Planning Condition wording for M4(2) Homes for Outline Planning Applications for residential developments of 10 or more dwellings in the former Suffolk Coastal area. –</p> <p>Text amended to clarify condition relates to M4(2) and/or M4(3) standards where applicable.</p> <p>Standard Planning Condition wording for M4(2) Homes for Outline Planning Applications for residential developments of 10 or more dwellings in the former Waveney area. -</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>residential developments of 10 or more dwellings in the former Suffolk Coastal area. – Pigeon notes the policy requirement clearly relates to Part M4(2). The condition should be clear there is no requirement for the provision of dwellings which comply with Part M4(3).</p> <p>Standard Planning Condition wording for M4(2) Homes for Outline Planning Applications for residential developments of 10 or more dwellings in the former Waveney area. - Pigeon notes the policy requirement clearly relates to Part M4(2). The condition should be clear there is no requirement for the provision of dwellings which comply with Part M4(3).</p> <p>Standard Planning Condition wording for M4(2) Homes for Full Planning Applications and Reserved Matters for all new residential developments of 10 or more dwellings.- Pigeon notes the policy requirement clearly relates to Part</p>		<p>Text amend to clarify condition relates to M4(2) and/or M4(3) standards where applicable.</p> <p>Standard Planning Condition wording for M4(2) Homes for Full Planning Applications and Reserved Matters for all new residential developments of 10 or more dwellings.- Text amended to clarify and simplify condition.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		M4(2). The condition should be clear there is no requirement for the provision of dwellings which comply with Part M4(3).		

## Appendix D - Sustainable development checklist

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd (Fillmore, Andrew)	52	<p>Checklist topic – Energy efficiency and carbon reduction – Pigeon notes there needs to be a distinction in the SPD between the carbon reduction calculations that are required for outline planning applications and a detailed submission.</p> <p>An outline application can provide generic carbon reduction calculations but the value of these are questionable. The SPD, as currently drafted, seeks a level and detail of information that is unnecessary, inappropriate and disproportionate to the requirements (at either national or local level) of an outline application submission.</p>	<p>The checklist is not intended to be a comprehensive list for each type of planning application or development, it is not intended to replace the validation list and it is not providing detailed guidance and information.</p> <p>The checklist as stated in Appendix D is intended to assist in delivering sustainable development. The checklist prompts applicants to consider various aspects of sustainable development that may or may not be relevant to their development. Consideration of issues at an early stage in development can assist in the incorporation of different principles.</p>	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Checklist topic – Materials – Pigeon notes there needs to be a distinction in the SPD between the information required for outline planning applications and a detailed submission. If the use of recycled building materials is to be a requirement of a detailed planning application, then the SPD needs to set out clearer guidance as to what proportion is acceptable. We would suggest that worked example(s) are included in the SPD.</p> <p>Checklist topic – Construction methods and standards – Pigeon notes that details of construction methods will only be known post Reserved Matters consent, and the SPD should make clear these details will be secured by condition appended to the Reserved Matters approval.</p> <p>Checklist topic – Siting, form and orientation – Pigeon requests an explanation for what is need for an outline application versus a detailed application. Greater clarity is</p>		

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>needed in terms of the proportion of buildings which are needed to be orientated in a way which maximises daylight, solar gain and natural ventilation. Many factors influence a site layout and the orientation of buildings. Each site has constraints and opportunities and whilst important this aspiration needs to be balanced against others as part of a holistic design approach for each site.</p> <p>Checklist topic – Renewable or low carbon energy – Pigeon notes there needs to be a distinction in the SPD between the information required for outline planning applications and a detailed submission.</p> <p>Checklist topic – Historic Environment – It is unclear how many of these requirements relate to this SPD. To avoid duplication this section of the Appendix should be removed. It is already in the Historic Environment SPD.</p> <p>Checklist topic – Nature and</p>		



Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>Wildlife– No objection from Pigeon.</p> <p>Checklist topic – Sustainable Travel – No objection from Pigeon.</p> <p>Checklist topic – Sustainable Travel – Pigeon considers the level of detail required to demonstrate compliance is excess for an outline planning application. The SPD needs to make clear this only needs to be addressed as part of a Full or Reserved Matters Application.</p> <p>Checklist topic – Flood Risk and Sustainable Drainage Systems – No objection from Pigeon.</p> <p>Checklist topic – Waste – Pigeon requested the SPD provides further details on the level of information sought along with examples relating to waste.</p> <p>Checklist topic – Healthy Buildings and Places – Pigeon considers the level of detail</p>		

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		required to demonstrate compliance is excess for an outline planning application. The SPD needs to make clear this only needs to be addressed as part of a Full or Reserved Matters Application.		



Email us



Planning Policy and Delivery Team  
[planningpolicy@east Suffolk.gov.uk](mailto:planningpolicy@east Suffolk.gov.uk)

Call us



01394 444557

Write to us



East Suffolk Council  
Riverside, 4 Canning Road, Lowestoft  
Suffolk NR33 0EQ

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