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**From:** Peter Chisnall <Peter.Chisnall@baberghmidsuffolk.gov.uk>

**Sent:** 09 February 2022 17:41

**To:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>; Samantha Summers <Samantha.Summers@baberghmidsuffolk.gov.uk>

**Subject:** DC/21/04359

**Dear Samantha,**

**APPLICATION FOR RESERVED MATTERS - DC/21/04359**

**Proposal:** Reserved Matters Application following Outline Application DC/19/01973 and subsequent appeal APP/D3505/W/19/3241261. Town and Country Planning Act 1990 - Erection of 65No residential dwellings (of which 35% allocated as affordable homes) including landscaping, public open space and associated infrastructure.

**Location:** Land South Of, Slough Road, Brantham, Suffolk

Many thanks for your request to comment on the Sustainability/Climate Change mitigation related aspects of this application.

I have viewed the Applicant's latest updated Energy Strategy and EV Charging Plan and note the contents therein.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

With developments constructed with levels of insulation, fabric measures and low carbon building services just equal or slightly better the current building regulations' Part L requirements for domestic buildings, it is likely that they will need to be retrofitted within a few years. This is to meet; the National milestones, the Future Homes Standard, meaning dwellings are at least zero-carbon ready, and targets leading up to zero carbon emissions by 2050. The other issue is that the properties will be more expensive to heat in the winter and may overheat in the summer.

I have no objection to the application, however, if the planning department decided to permit and set conditions on the application, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

The Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, CS12, CS13, CS15 and NPPF) bearing in mind the Climate Emergency including details on environmentally friendly materials, construction techniques, minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day).

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO<sub>2</sub> reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

With all Sustainability and Energy Strategies the Council is requiring the applicant to indicate the retrofit measures required and to include an estimate of the retrofit costs for the buildings on the development to achieve net Zero Carbon emissions by 2050. It is also to include the percentage uplift to building cost if those measures are included now at the initial building stage. The applicant may wish to do this to inform prospective and future owners of the properties. In addition the risk of overheating in the properties due to future climate change.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

Guidance can be found at the following locations:

<https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Regards,

Peter

**Peter Chisnall**, CEnv, MIEMA, CEnvH, MCIEH  
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