

**Climate change and sustainable
building
Planning advice note**

November 2022

Contents

Glossary	3
Executive summary	5
Introduction – the climate emergency context in West Suffolk	6
What has climate change got to do with planning? National policy context	7
So why do we need a planning advice note?	7
How current planning policies apply to new development in West Suffolk	8
What you will need to submit with your planning application	10
Appendix 1 – Current policies on climate change mitigation and adaptation.....	17
Appendix 2 – sustainable development checklists.....	29
Appendix 3 – references and further guidance	44

Glossary

Building Emission Rate (BER) - the CO₂ emission rate of a non-residential building based on its design specification. The BER is a metric used to assess compliance with the Building Regulations.

Carbon neutral: carbon neutral refers to a policy of not increasing carbon emissions and of achieving carbon reduction through offsets.

Climate change adaptation: adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Core strategy: part of the development plan for the area. West Suffolk's development plan comprises the former Forest Heath area's Core Strategy, Single Issue Review (SIR) and Site Allocations Local Plan (SALP), and the former St Edmundsbury area's Core Strategy, three Vision 2031 documents (Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031), and the Joint Development Management Policies Local Plan (JDMP).

Decentralised energy: local renewable and local low carbon energy sources.

Dwelling Emission Rate (DER) - the CO₂ emission rate of a dwelling based on its design specification. The DER is a metric used to assess compliance with the Building Regulations.

Forest Stewardship Council (FSC) - a body that promotes responsible management of the world's forests. It provides sustainability certification for timber products by setting specific standards that timber supplier must meet

Green infrastructure: a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Greenhouse gas: greenhouse gases contribute to the greenhouse effect – a process that occurs when gases in the Earth's atmosphere trap the heat of the sun. The gases that contribute most to the Earth's greenhouse effect are water vapour (H₂O), carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄) and ozone (O₃).

Greywater, greywater recycling: greywater is the water used within a home, for example in sinks, showers, baths and dishwashers. Greywater recycling is when this water is cleaned and returned to the plumbing system for use in toilets, washing machines and outside taps.

Major development: for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of one hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Modern methods of construction (MMC) – methods of construction that are typically quicker, cheaper and more sustainable than traditional construction methods. MMC include offsite prefabrication, modular construction, precast panels and insulated concrete forms.

Net zero: means that any carbon emissions created from a project, product or service is effectively cancelled out by making changes to reduce carbon emissions to the lowest amount (and offsetting as a last resort). Net zero is achieved when the amount of carbon emissions added are no more than the amount taken away.

Open space: all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Photovoltaics, PV: see solar panels below.

Renewable and low carbon energy: includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Recycled aggregates: aggregates resulting from the processing of inorganic materials previously used in construction, for example construction and demolition waste.

Solar panels and photovoltaics: solar panels, also known as photovoltaics (PV) use the sun's energy and convert it into electricity that can be used in homes and businesses.

Sustainable development: whilst the National Planning Policy Framework (NPPF) does not include a definition of sustainable development it does summarise the objective of sustainable development as "meeting the needs of the present without compromising the ability of future generations to meet their own needs" (Resolution 42/187 of the United Nations General Assembly).

Target Emission Rate (TER) - the target CO2 emission rate for a new building set by the Building Regulations. The TER differs depending on the detail of the building.

Transport assessment: a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed to deal with the anticipated transport impacts of the development.

Transport statement: a simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel plan: a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Wildlife corridor: areas of habitat connecting wildlife populations.

Zero-carbon: means that no carbon emissions are being produced from a product or service.

Executive summary

Planning policy at the local level can play a significant part in addressing the impacts of climate change by developing and creating policies that will ensure all proposals for new development incorporate a zero-carbon approach from the outset.

This planning advice note (PAN) refers to existing policies in the core strategies of the former Forest Heath and St Edmundsbury areas, and in the Joint Development Management Policies document, and signposts advice and guidance and emerging policies and practice to help prepare developers and householders proposing new developments to access the most up-to-date information.

Three checklists have been prepared to accompany this PAN (see Appendix 2) which are set out as a series of requests for specific information and questions aimed at a consistent approach to ensuring documents accompanying planning applications (such as sustainability statements, energy statements, and the British Research Establishment's Environmental Assessment Method (BREEAM) pre-assessment) include the required evidence based on current planning policies.

It is expected that all proposals for new development will, as a minimum, address the following issues and use the checklists in appendix 2 to clearly demonstrate how the proposal links to current planning policy requirements:

- **Energy and CO2 emissions** – minimising energy consumption compared to the current national and regional minimum requirements; low and zero carbon energy generation.
- **Water efficiency** – use of low water volume fittings. Consider grey water recycling, provision of water butts.
- **The environment** – health and wellbeing, reduction and prevention of pollution, urban cooling, avoidance of surface water flooding (provision of sustainable urban drainage systems (SuDS)).
- **Place-making, design and materials** – how development is located and designed to withstand the longer-term impacts of climate change; high levels of insulation; choice of materials; use of materials from a sustainable local source in new development.
- **Transport and accessibility** – active travel and design of streets.
- **Biodiversity** – conserve and enhance biodiversity and protect geodiversity of sites and surrounding areas, including protected species, priority habitats and designated sites, through the implementation of the mitigation hierarchy and biodiversity net gain.
- **Waste** – adequate provision for separation and storage of waste for recycling; construction waste management and disposal.

The PAN is not a policy document but a practical guide. However, **adherence to this PAN will be a material consideration when determining planning applications.**

Introduction – the climate emergency context in West Suffolk

The climate emergency has led West Suffolk Council to assess current policies and actions. This advice note aims to ensure that applications for planning permission, from householder extensions to large-scale developments, both residential and non-residential, consider and address a range of issues designed to incorporate measures to mitigate or adapt to climate change.

West Suffolk has a good track record of reducing the council's impact on climate change since 2010. The council declared a climate change emergency in 2019, later strengthened to a climate and environment emergency in July 2020. West Suffolk's Environment and Climate Change Taskforce was established to strengthen and expand the work the authority is already undertaking and has produced a road map of initiatives aimed at taking the council to net-zero carbon emissions by 2030. For more details on the taskforce review see the [update to Cabinet](#); for more information on West Suffolk's work on climate change, please visit the [protecting our environment](#) pages of our website.

Overview of environmental performance 2020 to 2021

- 50.2 per cent reduction in total emissions compared to 2010 baseline. Total emissions down 28.6 per cent compared to the previous year.
- 11 percent reduction in total council fuel use compared to previous year. Total owned vehicle emissions have decreased by 17 per cent compared to the 2010 – 2011 baseline.
- 58 per cent reduction in total water consumption compared to baseline. 52 per cent reduction in total water consumption compared to previous year.
- 41 electric vehicles can be charged at the same time using public chargers installed by West Suffolk Council.
- 86 per cent increase in renewable energy generated compared to 2012. Renewable energy generated up by 11 per cent compared to 2019 to 2020.
- 6 Green Flag status parks held during 2020 to 2021 – regaining Green Flag status for West Stow Country Park.
- 75.5 per cent recycling rate, which is up 39 per cent compared to 2019 to 2020. 52 per cent reduction in total office waste compared to previous year.
- 1,500 plants and trees planted during 2020 to 2021.
- 78 per cent less business travel compared to 2010 baseline. Business travel down 67 per cent compared to 2019 to 2020.

Over the last decade, the council has installed a range of energy efficiency measures, different building materials and renewable energy technologies in its own buildings. The newest development, the Mildenhall Hub, includes advanced glazing and high levels of insulation materials, gas fired combined heat and power, ground source heat pump technology, solar photovoltaic arrays, an extensive building management system and a battery energy storage system.

The council provides a range of support services for homeowners and businesses including a Solar for Business programme that has successfully installed 3.5-megawatt peak (MWp) of solar photovoltaic panels on building roofs.

West Suffolk is working collaboratively with other Suffolk authorities as part of the Suffolk Climate Change Partnership (SCCP) towards the aspiration of making the county of Suffolk carbon neutral by 2030. A key theme of [Suffolk's Climate Emergency Plan](#) is the delivery of sustainable homes, both new housing and through the retrofit of existing homes, and as part of this initiative a [Net Zero Carbon Toolkit](#) has been published. This is a practical and easy to navigate guide on how to plan any Net Zero housing project that should be considered in conjunction with West Suffolk's planning policies and building regulations.

What has climate change got to do with planning? National policy context

At the national level the Climate Change Act 2008 introduced a statutory target of reducing carbon dioxide emissions to at least 80 per cent below 1990 levels by 2050, stepped every five years. In June 2019 the government committed the UK to bring all greenhouse gas emissions to net zero by 2050.

The [National Planning Policy Framework](#) (NPPF) sets out the Government's planning policies for England and how these should be applied. It sets out in paragraph 11 the presumption in favour of sustainable development which includes a requirement for all plans to promote a sustainable pattern of development that seeks to... "mitigate climate change... and adapt to its effects". Section 14 Meeting the challenge of climate change, flooding and coastal change paragraphs 152 to 169 are especially relevant and guide local policies and guidance.

[Planning Policy Guidance](#) (PPG) is an online resource providing guidance linked to the sections of the NPPF. The climate change section provides guidance on how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.

The [Climate Change Committee](#) (CCC) is an independent, statutory body established under the Climate Change Act 2008. Its purpose is to advise the UK and devolved governments on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change. It provides independent advice on setting and meeting carbon budgets and preparing for climate change, monitors progress in reducing emissions and achieving carbon budgets and targets, conducts independent analysis into climate change science, economics and policy, and engages with a wide range of organisations and individuals to share evidence and analysis.

So why do we need a planning advice note (PAN)?

Planning policy at the local level can play a significant part in addressing the impacts of climate change by developing and creating policies that will ensure all proposals for new development incorporate a zero carbon approach from the outset. [The West Suffolk Local Plan](#) (WSLP) is currently being prepared and will play a key role in implementing the Government and council's ambitions to reduce greenhouse gas emissions and adapt to climate change. Until the new plan is in place existing policies in the former Forest Heath and St Edmundsbury areas' Core Strategies, Site Allocations Local Plan (SALP), Vision 2031 documents, and in the Joint Development

Management Policies document (JDMP) will be applied to all proposals for new development (as appropriate to the scale of the proposal). This PAN refers to these policies and signposts advice and guidance and emerging policies and practice to help prepare developers and householders proposing new developments to access the most up to date information and underpins the research and evidence gathering taking place as the new West Suffolk Local Plan is produced.

How current planning policies apply to new development in West Suffolk

Designs for new residential or commercial developments often, and understandably, focus on the here and now with energy efficiency and carbon saving options considered towards the end of the process.

The bulk of our homes already exist and contribute to carbon emissions to a greater or lesser degree depending on the age of the building, type of energy source, level of insulation, type of windows and doors, and so on. Designing an extension to an existing home opens-up opportunities for retrofitting more energy efficient sources of heating, water saving appliances, shading and double or triple glazing, and other measures that will help future-proof the home. Checklist C in appendix 2 is designed to assist homeowners and building designers. It will be expected that applications for residential extensions and alterations will incorporate retrofitting measures for the existing home as well as any measures planned for proposed extensions and alterations.

Checklists A and B are intended for major development proposals and smaller development proposals respectively. (Note: the definition of 'major' development as set out in the National Planning Policy Guidance is that for housing, 'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'. For non-residential development it means 'additional floorspace of 1,000m² or more, or a site of one hectare'.

This planning advice note (PAN) aims to help both developers and homeowners with designing proposals and making decisions about improvements that will not cause environmental harm but instead contribute to futureproofing for climate change by:

- providing the planning policy context
- clarifying the information required when planning permission is required with examples
- signposting sources of information and further guidance.

It is not a policy document but a practical guide. However, **adherence to this PAN will be a material consideration when determining planning applications.**

Both the core strategies of the former Forest Heath District Council and St Edmundsbury Borough Council (both adopted 2010) include climate change policies (Forest Heath Core Strategy (FHCS) Policies CS2 Natural Environment and CS4 Reduce Emissions, Mitigate and Adapt to future Climate Change and Sustainable construction; and St Edmundsbury Core Strategy (SECS) Policies CS2 Sustainable Development, and CS7 Sustainable Transport).

The Joint Development Management Policies development plan document (JDMP) (2015) contains policies that seek to address different elements of climate change.

Policies:

- DM1: Presumption in Favour of Sustainable Development
- DM2: Creating Places - Development Principles and Local Distinctiveness
- DM3: Masterplans
- DM4: Development Briefs
- DM6: Flooding and Sustainable Drainage
- DM7: Sustainable Design and Construction,
- DM8: Low and Zero Carbon Energy Generation
- DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance
- DM11: Protected Species
- DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity
- DM13: Landscape Features
- DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards,
- DM22: Residential Design, and
- DM45: Transport Assessments and Travel Plans.

All the policies listed above are reproduced in Appendix 1.

In addition, there are a number of policies in the former Forest Heath area Site Allocations Local Plan (SALP) that require strategic landscaping and open space to be provided, and in the former St Edmundsbury area Vision 2031 documents such as policies BV26 Bury St Edmunds, HV18 Haverhill and RV9 that seek to protect and enhance green infrastructure. These policies should be considered and complied with as appropriate.

It is strongly recommended that the policies are read with the supporting text in each of the documents. For example, JDMP Policy DM7 Sustainable Design and Construction follows two pages of guidance including a diagram and explanation of the energy hierarchy.

Building Regulations

This PAN sets out planning policies and advice on what to submit with planning applications. New buildings and extensions also require Building Regulations approval, and advice should be sought separately on complying with regulations. The Building Regulations 2010 have been amended from 15 June 2022, and the following paragraph from an [explanatory circular](#) on the government website explains what these changes cover:

“This amendment to the Building Regulations 2010 applies to:

- new and existing dwellings
- new and existing non-domestic buildings
- with regards the new Part O on overheating, all new residential buildings

The Amendment Regulations provide for a new metric for the measurement of energy efficiency in the form of the target primary energy rate. They also introduce new regulation for on-site electricity generation and in relation to overheating. They also make provision about ventilation standards when work to which Part L (conservation of fuel and power) applies.”

In summary the June 2022 changes are to Document L (volume 1 for dwellings and volume 2 for non-residential development), Document F: ventilation new and existing dwellings, Document O: overheating (new dwellings only), and Document S: electric car charging (new dwellings only).

What you will need to submit with your planning application

A checklist of items that may be relevant to your planning proposal (the council's [validation requirements](#) for the submission of planning applications) are set out on the council's planning pages of the website.

The checklists that have been prepared to accompany this planning advice note (PAN) (see appendix 2) are additional and separate tools which are set out as a series of requests and questions aimed at ensuring sustainability statements, energy statements, strategies and British Research Establishment's Environmental Assessment Method (BREEAM) pre-assessment documents accompanying planning applications include the required evidence based on current planning policies. It is intended that the checklists in this PAN will eventually be incorporated in an updated version of the validation requirements.

JDMP local plan Policy DM7 begins: "All proposals for new development including the re-use or conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques. ..."

It is expected that all proposals for new development will, as a minimum, address the following issues and use the checklists in appendix 2 (as appropriate) to clearly demonstrate how the proposal links to current planning policy requirements.

- 1. Energy and CO2 emissions** – minimising energy consumption compared to the current national and regional minimum requirements; low and zero carbon energy generation.

Policies: JDMP LP Policy DM7; FHDC CS Policy CS4; SEBC CS Policy CS2 (J).

An energy statement is required that sets out what measures are proposed to achieve energy efficiency over-and-above building regulations standards prior to the introduction of the Future Homes Standards (2025).

There are several options for minimising energy consumption aiming to achieve net zero. At the home extension and renovation level this should include a package of measures such as replacing the boiler and considering installing air or ground source heat pumps, installing and/or incorporating photovoltaic (PV) panels on the roof, installing a smart meter, choosing low energy appliances, installing double or triple glazing, upgrading insulation.

New residential developments from a single dwelling to large-scale proposals should refer to the sustainable design and construction supporting text for JDMP Policy DM7 in paragraphs 3.14 to 3.21 including the energy hierarchy, and consider a package of measures that could include building to Passivhaus standard, achieving the British Research Establishment's Environmental Assessment Method (BREEAM) Home Quality

Mark certification, constructing to Code for Sustainable Homes standard (Code levels 5 and 6 minimum), and looking beyond the Future Homes Standard.

As a minimum applicants will be expected to include PV panels on roofs (unless it can be demonstrated that the orientation of the roof or lack of suitable roof area makes this impossible), double or triple glazing, roof and wall insulation, and renewable sources of energy (air or ground source heat pumps, biomass boilers, community or shared energy initiatives).

For more information see:

- information and a number of useful guides on home energy are available on the [Green Suffolk website](#)
 - [Net Zero carbon toolkit \(Suffolk\)](#)
 - [The Energy Saving Trust](#) for home energy advice, energy tools and calculators and guide to energy performance certificates
 - [The low energy building](#) database retrofit for the future – a repository of low-energy building information created to help inform the planning and development of low energy new build and refurbishment
 - the [London Energy Transformation Initiative](#) (LETI) website has useful guidance documents and their resources are used all over the country
 - [Passivhaus](#) is explained on their website
 - [BREEAM Home Quality Mark](#)
 - [Code for Sustainable Homes](#) technical guide – although published in 2010 and no longer used by the government it can be used as a holistic approach to building sustainable homes.
 - The first part of moving towards [The Future Homes Standard](#) is the publication in 2021 of changes to Part L of the Building Regulations that came into effect on 15 June 2022. The Future Homes Standard is a set of standards that will ensure that all new homes constructed from 2025 will produce 75 to 80 per cent less carbon emissions than homes delivered under current regulations.
 - **Historic buildings** – please see the guidance produced by Historic England [Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency | Historic England](#)
- 2. Water efficiency** – use of low water volume fittings. Consider grey water recycling, provision of water butts.

Policies: JDMP Policy DM7, FHDC CS Policy CS4; SEBC CS Policy CS2 G and J

West Suffolk is in one of the driest areas of the country where water is scarce and with the impact of climate change will become scarcer. It is crucial that water is used efficiently and policy DM7 sets a limit on water consumption for new dwellings. There are several ways in which this can be achieved, and proposals for all new developments should demonstrate the measures to be incorporated to achieve the standard set or a lower rate if possible.

The efficient use of water extends to the landscape and gardens around new homes. New homes should be provided with water butts so that rainwater can be used to water gardens, and landscaping schemes should aim to use plants that are drought tolerant.

As a minimum applicants will be expected to comply with the water efficiency measures set out in policy DM7 and provide at least one water butt per dwelling. Other grey water recycling measures are encouraged.

For more information see:

- [Anglian Water – save water](#)
- [Environment Agency – Water stressed areas Final classification 2021](#)
- [Green building store – making buildings better five articles on water saving](#)
- [Net Zero toolkit \(Suffolk\)](#)

3. The environment – health and wellbeing, reduction and prevention of pollution, avoidance of surface water flooding (provision of SuDS)

NPPF paras 107 and 112; JDMP Policies DM2 (g) (h) and (i), DM3, DM4, DM14, and DM22, FHDC CS Policy CS4; SEBC CS Policy CS2

Examples of sustainable building design and construction areas that can contribute to reducing carbon emissions and reducing pollution and benefitting human health and wellbeing include, for example, installing mechanical ventilation and extraction equipment, good quality insulation, efficient use of water to protect the quality and availability of drinking water, using SuDS to prevent flooding and land contamination, providing permeable paths or hard surfaces, installation of electric vehicle (EV) charging infrastructure, design to avoid overheating, provision of green infrastructure including quality open space and tree planting for shading, urban cooling and other ecosystem services.

As a minimum applicants will be expected to:

- provide a design for SuDS that complies with the [Suffolk Flood Risk Management Strategy Appendix A SuDS design guide](#)
- specify permeable surfaces where possible or appropriate
- install EV charging infrastructure in accordance with [Suffolk guidance for parking](#)
- include mechanical heat recovery and ventilation in the build (or demonstrate why it isn't possible or appropriate)
- demonstrate how the proposal avoids overheating
- demonstrate how existing trees and other features such as hedges and ditches are to be protected, and
- proposals for green infrastructure and tree planting

For more information see:

- Suffolk Flood Risk Management Strategy – Appendix A [SuDS - A Local Design Guide](#)
 - EV charging guidance [Suffolk Guidance for Parking](#)
 - definition and explanation of [mechanical ventilation and heat recovery](#) systems (referred to as MVHR or sometimes MHRV)
 - [Net Zero toolkit \(Suffolk\)](#)
 - former St Edmundsbury area [Green Infrastructure Strategy](#)
 - former Forest Heath area [Open space, sport and recreation facilities supplementary planning document](#) (supplementary planning document (SPD))
 - former St Edmundsbury area [Open space, sport and recreation facilities](#) SPD
 - BS 5837:2012 – Trees in relation to design, demolition and construction – Recommendations – details the steps that should be taken to ensure that trees are appropriately and successfully retained when a development takes place. Copies of BS 5837 are available to purchase from the [British Standards Institution](#).
 - guidance on biodiversity net gain – [Partnership for biodiversity in planning](#)
 - [Biodiversity 2020: A strategy for England’s wildlife and ecosystem services](#)
- 4. Place-making, design and materials** – how development is located and designed to withstand the longer-term impacts of climate change; high levels of insulation; choice of materials; use of materials from a sustainable local source in new development.

JDMP DM2, DM3, DM4, DM7, DM22, FHDC CS Policy CS 4, SEBC CS Policy CS2

“Places affect us all – they are where we live, work and spend our leisure time. Well-designed places influence the quality of our experience as we spend time in them and move around them. We enjoy them, as occupants or users but also as passers-by and visitors. They can lift our spirits by making us feel at home, giving us a buzz of excitement or creating a sense of delight. They have been shown to affect our health and well-being, our feelings of safety, security, inclusion and belonging, and our sense of community cohesion.” National Design Guide

This is the first paragraph in the [National Design Guide](#) (2021) and sums up why good design is so important. Paragraph 18 explains that the guide ‘has been prepared in the context of social, economic and environmental change.’ It is expected that change will be continuous as a consequence of climate change. Each section of the guide has a ‘looking forward’ box with prompts for consideration. For example, in the section on ‘Identity’ the box prompts consideration of: ‘how the proposed character responds to climate change?’ The guide explains that well-designed places are unlikely to be achieved by focusing on the appearance, materials and detailing of buildings: “It comes about through making the right choices at all levels, including: the layout (or masterplan); the form and scale of buildings; their appearance; landscape; materials; and their detailing.”

[Building for a Healthy Life](#) (2020) (BHL) is produced by Homes England and updates and renames 'Building for Life 12' which is: 'a design tool for creating places that are better for people and nature.' It is organised under three headings with 12 considerations presented 'to help those involved in new developments to think about the qualities of successful places and how these can be best applied to the individual characteristics of a site and its wider context.' The three headings and considerations are:

- integrated neighbourhoods - natural connections, walking, cycling and public transport, and homes for everyone
- distinctive places – making the most of what's there, a memorable character, well defined streets and spaces, and easy to find your way around, and
- streets for all – healthy streets, cycle and car parking, green and blue infrastructure, and back of pavement, front of home.'

In addition to complying with adopted local plan policies applicants will be expected to set out the approach taken to design and layout clearly referencing advice and guidance in the National Design Guide, Building for a healthy life, and other published guidance (such as The Climate Emergency Design Guide produced by the London Energy Transformation Initiative (LETI) and the Net Zero toolkit referenced below) that helps to illustrate ways in which the design, layout and source and choice of materials proposed addresses the climate emergency.

For more information see:

- [The National Design Guide](#) is an excellent source of advice
- [Building for a Healthy Life](#) published by Homes England, 2020
- [The New Homes Policy Playbook](#) is designed as a resource pack to help enable local authorities drive up the sustainability of new homes and contains many examples of up to date local plan policies from local authorities across the country and a 'helpful resources' section at the end of the document divided into three sections: carbon and energy demand reductions; mitigating overheating risk; and acoustics
- [The Climate Emergency Design Guide \(LETI\)](#)
- [Net Zero toolkit \(Suffolk\)](#)

5. Transport and accessibility - active travel.

JDMP DM2(k), DM3(m) and (n), DM4(f), DM22(h), (i) and (j), FHDC CS Policy CS12, SEBC CS Policy CS7

The NPPF at paragraph 104 advises that 'transport issues should be considered from the earliest stages of... development proposals'. It is important that safe and pleasant walking and cycling routes and connections to public transport are provided as the basis for new developments. "Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."

As a minimum applicants will be expected to demonstrate how the proposal meets adopted West Suffolk policies and how the design and layout reflects and refers to

advice in documents listed below, particularly the National Design Guide, Building for a Healthy Life and the [Suffolk Design Streets Guide 2022](#).

For more information see:

- [Active travel](#) is an online resource that 'aims to provide useful content for local authorities, and other organisations who want to increase levels of investment in walking and cycling provision.' The website includes case studies and a variety of information on walking and cycling including policy and research.
 - Developer checklist [Building Sustainable Transport into New Developments \(defra.gov.uk\)](#)
 - Active travel tool kit slide pack [PowerPoint Presentation \(sustrans.org.uk\)](#)
 - Travel Plan guidance [Travel plans for new or expanding developments | Suffolk County Council](#)
 - [The National Design Guide](#) is an excellent source of advice
 - [Building for a Healthy Life](#) published by Homes England, 2020
 - [Manual for Streets](#) published by the Department for Transport, and Department of communities and local government
 - [Suffolk Streets Design Guide](#) is a more detailed, local guide on designing for all street users using a hierarchy prioritising pedestrians and cyclists with illustrations and diagrams.
- 6. Biodiversity** – conserve and enhance biodiversity and protect geodiversity of the site and surrounding area, including protected species, priority habitats and designated sites, through the implementation of the mitigation hierarchy and biodiversity net gain.,. protect the natural capital of the area by applying an ecological network approach.

JDMP DM2(g), DM10, DM11, DM12, and DM14, FHDC CS Policy CS2, Policy CS4, SEBC CS Policy CS2, Policy CS3

Biodiversity matters because it supports the vital benefits humans get from the natural environment. It contributes to the economy, health and wellbeing and it enriches our lives. Humanity relies on the natural environment for food, clean water, medicine, and to absorb the greenhouse gasses that are driving climate change. These benefits that humans gain from a biodiverse natural environment are called ecosystem services. Biodiversity is protected through a range of policies in adopted local plan policies – see above and appendix 1.

As a minimum applicants should comply with adopted local plan policies and complete the [biodiversity checklist](#) on the council's website to submit a valid application. Where required applications should be supported by all the necessary completed surveys. Applicants should provide evidence that enhancement will be achieved, preferably through the submission of the Biodiversity Metric 3.0(or updated edition) or the Small Sites Metric.

For more information see:

- [Suffolk Biodiversity Validation Checklist](#)
- [Biodiversity Metric 3.0](#)

- [The Small Sites Metric](#)
 - [Suffolk Wildlife Trust](#)
 - [Suffolk's Nature Strategy](#)
 - [Suffolk Biodiversity Information Service](#)
 - [Chartered Institute of Ecology and Environmental Management](#)
 - [Circular 06/2005](#)
 - [Natural England](#)
- 7. Waste** – adequate provision for separation and storage of waste for recycling; construction waste management and disposal.

JDMP DM2(m), DM3(p) and (r), DM7, FHDC CS Policy CS4, SEBC CS Policy CS2

At the individual household level separating waste has become the norm, with a range of bins available within the home and separate bins and collection organised by the council. However, more can be done to reduce waste, re-use or recycle, and all residential developments from one home to many should have access to composting. On large developments this could be on an individual household basis or a community facility. Advice and purchase of composting bins for Suffolk residents (at subsidised cost) and advice on reducing, re-using and recycling plastic is available on the [Suffolk recycles website](#).

The use of local materials or materials from local sources can significantly improve the carbon efficiency of construction. The management and disposal of waste from construction is a key component of carbon reduction in the construction process. Consideration should be given at the earliest stage to how design of the proposal and its implementation can contribute to reducing carbon emissions through sourcing local materials, re-using and recycling construction materials, and managing construction waste through the project. Innovative waste management strategies will be supported.

As a minimum applicants will be expected to indicate the space available for refuse bins, the provision of composting for each dwelling or shared or community composting facilities. For major developments applicants will be expected to submit details of how construction waste will be minimised and managed and sources of materials.

For more information see:

- The Suffolk recycles website for advice on [reducing waste](#) in the following categories: home composting; food waste; plastic waste; electrical waste; cloth nappies; textiles waste; waste prevention pack; refill directory; and re-use your waste.
- An excellent guide to designing out construction waste endorsed by the Royal Institute of British Architects and produced by [WRAP Designing out waste](#)
- The [Green Guide is part of BREEAM an accredited environmental rating scheme](#) for buildings (Building Research Establishment's Environmental Assessment Method).

Appendix 1 – current policies on climate change mitigation and adaptation

Current policy is found in the following documents:

- Former Forest Heath area Core Strategy 2010
- Former St Edmundsbury area Core Strategy 2010
- Joint Development Management [Policies] Local Plan (JDMP) 2015
- Former Forest Heath area Site Allocations Local Plan (SALP) 2019
- Former St Edmundsbury area Vision 2031 (2014) (Bury St Edmunds, Haverhill, Rural).

It is strongly recommended that the policies set out below are read with the supporting text in each of the documents. For example, JDMP Policy DM7 Sustainable Design and Construction follows two pages of guidance including a diagram and explanation of the energy hierarchy.

Forest Heath Core Strategy Policy CS4 Reduce Emissions, Mitigate and Adapt to future Climate Change and Sustainable construction

The council will promote and encourage all development proposals to deliver high levels of building sustainability to avoid expansion of the districts ecological footprint and to mitigate against and adapt to climate change.

All new development proposals will be required to demonstrate how it minimises resource consumption, minimises energy consumption compared to the current national and regional minimum requirements and how it is located and designed to withstand the longer-term impacts of climate change.

Sustainable construction methods will be encouraged in all new dwellings to achieve at least three-star rating under the Code for Sustainable Homes. The council will monitor changes to standards and will consider introducing a requirement for development schemes to comply with higher sustainable construction standards where there is evidence to justify doing so.

These standards require consideration of issues such as:

- orientation to maximise solar gain
- use of low water volume fittings and grey water recycling
- high levels of insulation
- adequate provision for separation and storage of waste for recycling, and
- use of materials from a sustainable local source in new development.

The council will require development proposals to comply with Policy ENG1 of the Regional Spatial Strategy in contributing to the provision of decentralised, renewable and low carbon energy sources.

Development must also seek to adapt to the negative impacts from climate change including change upon biodiversity by protecting the rural districts natural capital and applying an ecological network approach – re-enforcing and creating links between core areas of biodiversity.

The council will support the development proposals that avoid areas of current and future **flood risk**, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.

Land will not be allocated in flood zones 2 and 3 with the exception of allocations for water compatible use. In the towns, where no reasonable site within flood zone 1 is available, allocations in flood zones 2 and 3 will be considered in accordance with PPS25 and the Strategic Flood Risk Assessment (SFRA) and only when the development meets the following criteria:

- appropriate land at a lower risk is not available
- there are exceptional and sustainable circumstances for locating the development within such areas
- the risk can be fully mitigated by engineering and design measures.

The council will seek the implementation of sustainable urban drainage systems into all new developments where technically feasible.

St Edmundsbury Core Strategy Policy CS2 – Sustainable Development

A high quality, sustainable environment will be achieved by designing and incorporating measures appropriate to the nature and scale of development, including:

The protection and enhancement of natural resources:

- a. making the most resource efficient use of land and infrastructure
- b. protecting and enhancing biodiversity, wildlife and geodiversity, and avoiding impact on areas of nature conservation interest in both rural and built-up areas
- c. identifying, protecting and conserving: a network of designated sites including the Breckland Special Protection Area (SPA) and other sites of national and local importance; Biodiversity Action Plan (BAP) habitat and species; wildlife or green corridors, ecological networks; and other green spaces will be identified, protected and habitats created as appropriate
- d. conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources
- e. conserving and, wherever possible, enhancing other natural resources including, air quality and the quality and local distinctiveness of soils
- f. protecting the quality and availability of water resources
- g. maximising the efficient use of water including recycling of used water and rainwater harvesting
- h. maximising the potential of existing and new sources of energy from biomass including timber and other energy crops, and

Sustainable design of the built environment:

- i. providing the infrastructure and services necessary to serve the development
- j. incorporating the principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice to cover the following themes:
 - **Energy and CO2 emissions** – seeking, where feasible and viable, carbon neutral development, low carbon sources and decentralised energy generation
 - **Water** – ensuring water efficiency by managing water demand and using such waste water reuse methods as rainwater harvesting and grey water recycling
 - **Materials** - minimising the use of resources and making use of local materials
 - **Surface water run-off** – incorporating flood prevention and risk management measures, such as sustainable urban drainage
 - **Waste** – adhering to the waste hierarchy during construction and following development to prevent waste generation and ensure reuse, recovery and recycling
 - **Pollution** – remedying existing pollution or contamination and preventing further pollution arising from development proposals
 - **Transport** – minimising the need for travel and ensuring a balance between transport infrastructure and pedestrians
 - **Health and wellbeing** – ensuring that the development enhances the quality of life of future occupants and users
 - **Ecology** – valuing and enhancing the ecological features of the development site, where appropriate.
- k. ensuring that developments and their occupants are capable of managing the impact of heat stress and other extreme weather events

- l. making a positive contribution towards the vitality of the area through an appropriate mix of uses. In areas of strategic growth this will include employment, community, retail, social, health and recreation facilities (including the protection and provision of informal and formal recreation, parks, open spaces and allotments)
- m. creating a safe environment which enhances the quality of the public realm
- n. making a positive contribution to local distinctiveness, character, townscape and the setting of settlements
- o. conserving or enhancing the historic environment including archaeological resources.

Where appropriate, site specific and area targets, along with detail of viability, to meet national standards and codes, will be set out in the Development Management document, Area Action Plans and the Rural Site Allocations document.

Only development that will not adversely affect the integrity of the SPA will be permitted. In applying this policy a buffer zone has been defined that extends 1,500m from the edge of those parts of the SPA that support or are capable of supporting stone curlews, within which:

- a. Permission may be granted for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development; alternatively
- b. Permission may be granted for other development not mentioned in sub paragraph (a) provided it is demonstrated by an appropriate assessment that the development will not adversely affect the integrity of the SPA.

A further 1,500m buffer zone has been defined which extends around those areas (shown on the Proposals Map) outside of the SPA which have supported five or more nesting attempts by stone curlew since 1995 and as such act as supporting stone curlew habitat, within which permission may be granted in accordance with a) and b) above. Additionally, within this zone, where it can be shown that proposals to mitigate the effects of development would avoid or overcome an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the Local Planning Authority is satisfied that those proposals will be implemented. In these areas development may also be acceptable providing alternative land outside the SPA can be secured to mitigate any potential effects.

Development at Risby (which lies partly within the 1,500m stone-curlew buffer) will be possible if it is fully screened from the Breckland SPA by existing development. A project level appropriate assessment should be undertaken to ensure no adverse effect upon the integrity of the SPA.

A 400m buffer zone has been defined around those parts of the SPA that support or are capable of supporting nightjar and woodlark. Any development proposal within this zone will need to clearly demonstrate that it will not adversely affect the integrity of the SPA.

St Edmundsbury Core Strategy Policy CS7 Sustainable Transport

The council will develop and promote a high quality and sustainable transport system across the borough and reduce the need for travel through spatial planning and design.

All proposals for development will be required to provide for travel by a range of means of transport other than the private car in accordance with the following hierarchy:

- walking
- cycling
- public transport (including taxis)
- commercial vehicles
- cars.

All development proposals will be required to be accessible to people of all abilities including those with mobility impairments.

New commercial development, including leisure uses and visitor attractions, which generate significant demands for travel, should be located in areas well served by a variety of transport modes. Where appropriate, development proposals that will have significant transport implications will be required to have a transport assessment and travel plan showing how car based travel to and from the site can be minimised.

Joint Development Management Policies Document 2015

- DM1: Presumption in Favour of Sustainable Development
- DM2: Creating Places – Development Principles and Local Distinctiveness
- DM6: Flooding and Sustainable Drainage
- DM7: Sustainable Design and Construction
- DM8: Low and Zero Carbon Energy Generation
- DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- DM45: Transport Assessments and Travel Plans.

Policy DM1: Presumption in Favour of Sustainable Development

When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this local plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the councils will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or
- Specific policies in that Framework indicate that development should be restricted.

Policy DM2: Creating – Development Principles and Local Distinctiveness

Proposals for all development (including changes of use, shopfronts, and the display of advertisements) should, as appropriate:

- a. recognise and address the key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape/townscape character appraisal to demonstrate this
- b. maintain or create a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded
- c. preserve or enhance the setting of, or views into and out of, a conservation area
- d. not involve the loss of gardens and important open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement
- e. provide in line with national and detailed local policies (including policies in this plan), open space, recreation, play and leisure facilities as appropriate
- f. incorporate sustainable design and construction measures and energy efficiency measures as required by Policy DM7 of this Plan
- g. taking mitigation measures into account, not affect adversely:
 1. the distinctive historic character and architectural or archaeological value of the area and/or building
 2. the urban form, including significant street patterns, individual or groups of buildings and open spaces
 3. important landscape characteristics and prominent topographical features
 4. sites, habitats, species and features of ecological interest
 5. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated, and/or
 6. residential amenity
 7. not site sensitive development where its users would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented.
- h. produce designs and layouts which are safe and take account of crime prevention, community safety and public health
- i. produce designs that respect the character, scale, density and massing of the locality
- j. produce designs that provide access for all, and that encourage the use of sustainable forms of transport through the provision of pedestrian and cycle links, including access to shops and community facilities, and
- k. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network, and
- l. where necessary, incorporate appropriate refuse and recycling facilities, compost bins, water butts and litter and dog waste bins.

Policy DM6: Flooding and Sustainable Drainage

Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere. Examples include: rainwater harvesting and greywater recycling, and run-off and water management such as sustainable urban drainage systems (SUDS) or other natural drainage systems.

Policy DM7: Sustainable Design and Construction

All proposals for new development including the re-use or conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques.

In particular, proposals for new residential development will be required to demonstrate that appropriate water efficiency measures will be employed to ensure that either:

- water consumption is no more than 110 litres per person per day (including external water use) as calculated using the government's (September 2009) Water Efficiency Calculator or such standard that replaces it, or
- no water fitting exceeds the values set out in Table 1 (or any other fittings specification that government issues to supersede this).

Table 1: fittings-based specification from DCLG (2014) Housing Standards Review: approved Document G: Requirement G2
Water efficiency

- **Water fitting: WC.**
National base level: 6 and 4 dual-flush, or 4.5 litres single flush.
- **Water fitting: Shower.**
National base level: 10 litres per minute.
- **Water fitting: Bath.**
National base level: 185 litres
- **Water fitting: Basin taps.**
National base level: 6 litres per minute.
- **Water fitting: Sink taps.**
National base level: 8 litres per minute.
- **Water fitting: Dishwasher.**
National base level: 1.25 litres per place setting.
- **Water fitting: Washing machine.**
National base level: 8.17 litres per kilogram.

All new non-residential developments over 1000 square metres will be required to achieve the British Research Establishment's Environmental Assessment Method (BREEAM) Excellent standard or equivalent unless it can be demonstrated that one or more of the following conditions apply:

- it is not possible to meet one or more of the mandatory credits for an Excellent rating due to constraints inherent within the site. In this case development will be expected to accrue the equivalent number of credits by targeting other issues while achieving an overall Very Good rating.
- the cost of achieving an Excellent rating can be demonstrated to compromise the viability of the development. In this case applicants will be expected to

agree with the council whether the target should be relaxed, or whether cost savings could be achieved in another aspect of the development.

All new developments will be expected to include details in the design and access statement (or separate energy statement) of how it is proposed that the site will meet the energy standards set out within national building regulations. In particular, any areas in which the proposed energy strategy might conflict with other requirements set out in this plan should be identified and proposals for resolving this conflict outlined.

Policy DM8: Low and Zero Carbon Energy Generation

All proposals for generation or recovery of low carbon or renewable energy, such as wind turbines, biomass, and combined heat and power, will be encouraged subject to the following criteria:

- a. proposals will be required to demonstrate the new carbon saving benefit that they will create, taking into account both carbon dioxide savings from renewable energy generation and any additional carbon dioxide generation that results from the proposal
- b. proposals will be required to include a landscape and visual assessment which should, where appropriate:
 - 1. show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact
 - 2. include mitigation measures to address the visual impact of the scheme
 - 3. include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments
- c. where appropriate the proposal includes provision for mitigation and compensation measures, such as habitat enhancement or relocation.

All proposals will need to demonstrate to the satisfaction of the local planning authority that due regard has been given to the following:

- d. the impact of off-site and on-site power generation infrastructure including achieving underground connections to the electricity grid system, and
- e. in respect of proposals for wind turbines, current standards relating to noise emission, shadow flicker and other negative effects such as interference to television transmission and air traffic control systems and the effects on public health, and
- f. soil quality is not affected adversely by either construction or the operation or decommissioning of the development.

In the case of proposals in nature conservation sites, or within or visible from conservation areas or other heritage assets, the developer or operator must be able to demonstrate to the satisfaction of the local planning authority that the proposal represents the highest standards of siting and design appropriate to the location.

Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards

Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Planning Authority to make a full assessment of potential hazards.

Development will not be permitted where, individually or cumulatively, there are likely to be unacceptable impacts arising from the development on:

- the natural environment, general amenity and the tranquillity of the wider rural area
- health and safety of the public
- air quality
- surface and groundwater quality
- land quality and condition, or
- compliance with statutory environmental quality standards.

Development will not be permitted where there is an unacceptable risk:

- a. due to siting on known or suspected unstable land, or
- b. due to siting on land which is known to be or potentially affected by contamination or where the land may have a particular sensitive end use
- c. due to the storage or use of hazardous substances.

Proposals for development on or adjacent to land which is known to be or potentially affected by contamination; or land which may have a particular sensitive end use; or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels, site investigations and other relevant studies, and remediation proposals and implementation schedule prior to or as part of any planning application.

In appropriate cases, the local planning authority may impose planning conditions or through a legal obligation secure remedial works and/or monitoring processes.

Policy DM45: Transport Assessments and Travel Plans

For major development and/or where a proposal is likely to have significant transport implications, the council requires the applicant to submit the following documents alongside their planning applications:

- a. a transport assessment appropriate to the scale of development and the likely extent of transport implications
- b. a travel plan that identifies the physical and management measures necessary to address the transport implications arising from development.

Where a transport assessment and/or travel plan does not demonstrate that the travel impacts arising from the development will be satisfactorily mitigated or that adequate measures are in place to promote the use of more sustainable modes of transport, then planning permission will not be granted. The developer will be expected to provide the necessary funding to deliver any travel plan agreed in writing with the local planning authority.

Where it is necessary to negate the transport impacts of development, developers will be required to make a financial contribution, appropriate to the scale of the development, towards the delivery of improvements to transport infrastructure or to facilitate access to more sustainable modes of transport.

Note: Indicative thresholds for application of transport assessments/transport statements are contained at Appendix B, Department for Transport Guidance March 2007, Guidance on Transport Assessment.

Note: The former Forest Heath area's SALP and former St Edmundsbury area's Vision 2031 documents are available on the council's [local plan pages](#).

Appendix 2 – sustainable development checklists

1. The core strategies of the former Forest Heath District Council and St Edmundsbury Borough Council (both adopted 2010) include sustainable development and climate change policies (FHCS Policy CS4 Reduce emissions, mitigate and adapt to future climate change and sustainable construction, and SECS Policies CS2 – Sustainable development, and CS7 Sustainable transport).
2. The Joint Development Management Policies Document (JDMP) (2015) also contains policies that seek to address different elements of climate change and achieve sustainable development more broadly policies:

DM1: Presumption in Favour of Sustainable Development

DM2: Creating Places

DM6: Flooding and Sustainable Drainage

DM7: Sustainable Design and Construction

DM8: Low and Zero Carbon Energy Generation

DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards

DM45: Transport Assessments and Travel Plans, and

DM46: Parking Standards

3. Policy DM7 of the JDMP document requires all proposals for new development, including the re-use or conversion of existing buildings, to adhere to broad principles of sustainable design and construction; and to optimise energy efficiency through the design, layout, orientation, materials, insulation, and construction techniques.
4. The completed checklists below will assist officers in assessing the development proposal against DM7 and other development plan policies and national planning policy in relation to meeting the challenge of climate change.
 - Checklist A – sustainable development checklist for major development proposals
 - Checklist B – sustainable development checklist for minor development proposals
 - Checklist C – sustainable development checklist for householder proposals

Checklist A - sustainable development checklist for 'major' development proposals

Note: NPPF definition of 'major' development - For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of one hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Please see checklist B for smaller development proposals (less than 'major') including residential extensions and refurbishment or renovation projects, and non-residential development of less than 1,000m², or checklist C for householder developments.

The checklist contains two parts. Part one should be completed in full and part two contains further optional questions. It is intended that part one will be added to the West Suffolk local validation requirements and will become mandatory, with part two of the list remaining desirable but optional.

Please use the table format below noting that the size of the response box does not indicate the length of response required. If submitting as a separate document, please follow the format as set out and cross-reference other documents submitted where appropriate.

For further advice and support please refer to the [protecting our environment](#) pages of the West Suffolk website or the [Green Suffolk](#) pages:

Part 1 – Please complete in full

For each question (numbered below) please answer with explanation or reference to where the required information can be found in the planning application.

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
1	Design and layout - energy efficiency and future proofing (JDMPD policies DM2-f, DM7, DM22, SECS policy CS2-K, FHCS policy CS4)	
1.1	In what ways has energy efficiency been, or will energy efficiency be, optimised in the layout, orientation, design, materials, insulation and construction techniques of the development?	
1.2	What specific measures are proposed to achieve relevant energy standards in accordance with building regulations standards?	
1.3	How have buildings been designed to enable low carbon solutions and climate resilience measures to be easily added in the future? (For example: space for battery storage or water tanks for air source heating systems)	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
2	Pollution and air quality (JDMPD policies DM2 and DM14, SECS policy CS2-E, FHCS policy CS4)	
2.1	What measures are incorporated into the development to address historic on-site contamination?	
2.2	How does the development aim to mitigate, prevent and reduce air and noise pollution?	
2.3	What electric vehicle charging infrastructure is proposed as part of the development and where is this to be provided (please illustrate on a plan if necessary)?	
2.4	Does the proposal include mitigation measures to address light pollution (where appropriate to the scale of the proposal)?	
3	Waste (JDMPD policies DM2-m and DM7, SECS policy CS2-J, FHCS CS4)	
3.1	Will the development include sufficient external and/or internal storage to enable separation and storage of materials for recycling and composting and is this indicated on the layout plans, block plans or floor plans? Supplementary question: if the proposals include areas for public open space are dog waste or general litter bins included. If yes, please indicate locations (or provisional locations) and explain how these will be managed and maintained in perpetuity.	
4	Water (JDMPD policy DM7, SECS policy CS2-F and G, FHCS CS4)	
4.1	For residential development, will the development include appropriate water efficiency measures so that consumption is no more than 110 litres per person per day?	
4.2	Does the development re-use rainwater or grey water for external use? For example: garden water butts or landscape watering.	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
4.3	Does the development re-use any water for internal use?	
5	Access and movement (JDMPD policies DM2-k, DM22-h, DM45 and DM46, SECS policy CS2-J)	
5.1	<p>How will the location, layout, design and infrastructure of the development encourage residents, occupiers, visitors, customers, employees, to travel sustainably, having regard to the sustainable transport hierarchy:</p> <ol style="list-style-type: none"> 1. active modes 2. public, shared, community transport 3. personal electric vehicles 4. personal internal combustion and hybrid engine vehicles. <p>Does the development provide suitable connections to existing walking and cycling routes to ensure connectivity to local amenities including schools, shops play areas, open space and other local facilities?</p> <p>Please provide a local connectivity plan showing the development in relation to these key destinations.</p>	
5.2	In what other ways does the design of the development reduce the need to travel (for example through digital connectivity or the inclusion of flexible home working space)?	
5.3	Does the development incorporate visible and secure cycle storage where it is needed for shared use and secure, practical cycle storage for private use (please indicate on a plan and provide specification details)?	
5.4	What other measures are proposed for the development to reduce the length and number of car journeys and traffic levels (for example: green travel plan)?	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
6	Natural environment (JDMPD policy DM12, SECS policy CS2, FHCS policy CS4)	
6.1	How does the development effectively protect and enhance ecology and biodiversity within and nearby the site (for example: specific measures to achieve biodiversity enhancement)?	
6.2	Does the proposal include the planting of new trees and hedgerows? Please provide details.	
7	Health and wellbeing (SECS policies CS2-J and CS3)	
	Does the development provide policy compliant onsite public open space and play space easily accessible to residents?	
8	British Research Establishment's Environmental Assessment Method (BREEAM) – Requirements for all non-residential development over 1000 square metres. (JDMPD policy DM7)	
8.1	Please provide a BREEAM pre-assessment for your development that achieves 'Excellent' standard. If this does not or cannot meet that standard, please explain why (as per the criteria in Policy DM7)	
9	Sustainable construction (JDMPD policy DM7, SECS policy CS2-J, FHCS policy CS4)	
9.1	Please provide a schedule of the materials and construction technologies proposed to be used (if known), with details of: <ul style="list-style-type: none"> • provenance (where they are to be sourced from) • sustainability credentials (for example: FSC approved timber) • confirmation that it was not possible or feasible to re-use or recycle existing materials from the development site (where relevant) • relevance of selected materials for potential future re-use and recycling • relevant energy use of construction technologies. 	

Checklist A - Part 2 – optional

The following section is optional. However, we would encourage the completion of this section in part or full, to demonstrate how your development helps meet the broader climate change challenges and the move towards net zero.

1	Renewable or low carbon energy and working to Net Zero (JDMD policies DM8 and DM7, SECH policy CS2-J, FHCS policy CS4)	
1.1	What on-site renewable and low carbon technologies are proposed as part of this development?	
1.2	What form(s) of energy will be supplied to the development?	
1.3	Does the development utilise site specific opportunities to mitigate carbon emissions effectively? (For example: maximising natural carbon storage on-site in soils and trees).	
1.4	Are off-site measures proposed to off-set the carbon footprint of the development? Please specify.	
2	Additional Energy Information (JDMD policies DM8 and DM7, SECH policy CS2-J, FHCS policy CS4)	
2.1	If possible, please provide confirmation of the Dwelling Fabric Energy Efficiency (DFEE) rate in comparison to the Target Fabric Energy Efficiency (TFEE) rate as identified through Standard Assessment Procedure (SAP) calculations. Note: residential development only.	
2.2	Please provide details of anticipated carbon emissions, with specific reference to percentage improvement reductions over Part L of the Building Regulations 2013. Where possible this should be demonstrated through supply of relevant SAP/SBEM outputs detailing the anticipated percentage reduction of the Dwelling Emission Rate (DER) or Building Emission Rate (BER) over the Target Emission Rate (TER). SAP/ SBEM outputs should be prepared by a suitably qualified individual.	

2.3	<p>What are the processes and quality controls that will be put in place to monitor building performance to ensure performance is as expected?</p> <p>This may refer to internal processes and quality controls, use of a recognised quality regime, or more specific arrangements.</p>	
3.	<p>Waste</p> <p>(JDMPD policies DM2-m and DM7, SECS policy CS2-J, FHCS CS4)</p>	
	<p>Please provide a copy of the Site Waste Management Plan (SWMP) if one has been drawn up.</p>	

Checklist B - Sustainable development checklist for smaller development proposals including residential developments of up to nine dwellings and change of use to residential.

The following checklist applies to all proposals for residential developments of less than 10 dwellings or on sites of less than 0.5ha, non-residential developments of less than 1,000m² or on sites of less than 1ha, and residential (householder) extensions or the re-use or conversion of existing buildings to residential uses.

Please see Checklist A for 'major' development proposals.

Please see Checklist C for 'householder' developments.

The checklist below should be completed in full or alternatively information should be provided in a separate document following the format below. If submitting as a separate document, please follow the format as set out and cross-reference other documents submitted where appropriate.

The checklist contains two parts. Part one should be completed in full and part two contains further optional questions. It is intended that part one will be added to the West Suffolk local validation requirements and will become mandatory, with part two of the list remaining desirable but optional.

For further advice and support please refer to [West Suffolk Council website](#) or the [Green Suffolk pages](#):

Checklist B - Part 1 – please complete in full

For each question (numbered below) please answer with explanation or reference to where the required information can be found in the planning application.

Please note that the size of the box does not indicate the length of response required. Please cross reference other submitted documents where appropriate.

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
1	Design and Layout - energy efficiency and future proofing (JDMPD policies DM2-f, DM7, DM22, SECS policy CS2-K, FHCS policy CS4)	
1.1	In what ways has energy efficiency been, or will energy efficiency be, optimised in the layout and orientation (if appropriate), the design, materials, insulation and construction techniques of the proposed development?	
1.2	What specific measures are proposed to achieve relevant energy standards in accordance with building regulations?	
1.3	How has or have the building or buildings, or the extension been designed to enable low carbon solutions and climate resilience measures to be	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
	easily added in the future (for example: space for battery storage or water tanks for air source heating systems)?	
2	Pollution and air quality (JDMPD policies DM2 and DM14, SECS policy CS2-E, FHCS policy CS4)	
2.1	What electric vehicle (EV) charging infrastructure is proposed as part of the development and where is this to be provided (please illustrate on a plan if necessary)? If no EV charging infrastructure is proposed, please explain why.	
3.	Waste (JDMPD policies DM2-m and DM7, SECS policy CS2-J, FHCS CS4)	
3.1	For new residential developments or changes of use from non-residential to residential, will the development include sufficient external and/or internal storage to enable separation and storage of materials for recycling and composting and is this indicated on the layout plans, block plans or floor plans?	
4	Water (JDMPD policy DM7, SECS policy CS2-F and G, FHCS CS4)	
4.1	Policy DM7 requires proposals to demonstrate that appropriate water efficiency measures are employed that demonstrate water consumption is either no more than 110 litres per person per day or no water fittings exceed the values specified in the policy. Please indicate which water efficiency approach is proposed.	
4.2	Does the development re-use rainwater and/or grey water for external use? For example: garden water butts or landscape watering	
4.3	Does the development re-use any water for internal use?	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
5	Access and movement (JDMPD policies DM2-k, DM22-h, DM45, SECS policy CS2-J)	
5.1	<p>For residential development proposals, the layout and design should accord with the sustainable transport hierarchy:</p> <ol style="list-style-type: none"> 1. active modes 2. public, shared, community transport 3. personal electric vehicles 2. personal internal combustion and hybrid engine vehicles. <p>How does the design and layout achieve this and does the development provide suitable connections to existing walking and cycling routes to ensure connectivity to local amenities including schools, shops play area, open space and other local facilities?</p> <p>Please provide a local connectivity plan showing the development in relation to these key destinations.</p>	
5.2	<p>For new residential development proposals, in what other ways does the development contribute to reducing the need to travel (for example through digital connectivity or the inclusion of flexible home working space)?</p>	
5.3	<p>Does the development incorporate visible and secure cycle storage where it is needed for shared use and/or secure, practical cycle storage for private use (please indicate on a plan and provide specification details)?</p>	
6	Natural Environment (JDMPD policy DM12, SECS policy CS2, FHCS policy CS4)	
6.1	<p>How does the development retain, protect and/or enhance biodiversity within the site (including boundary trees and hedges as appropriate)?</p>	
6.2	<p>Does the proposal include the planting of new trees and hedgerows? Please provide details.</p>	
7	Sustainable construction (JDMPD policy DM7, SECS policy CS2-J, FHCS policy CS4)	
7.1	<p>Please provide a schedule of the materials and construction technologies proposed to be used (if known), and if possible/appropriate to the scale of development proposed, details of:</p>	

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
	<ul style="list-style-type: none"> • provenance (where they are to be sourced from) • sustainability credentials (for example: FSC approved timber) • confirmation that it was not possible or feasible to re-use or recycle existing materials from the development site (where relevant) • potential for future re-use and recycling of selected materials (where relevant or appropriate) • relevant energy use of construction technologies if known or available. 	

Checklist B - Part 2 – Optional

The following section is optional. However, we would encourage the completion of this section in part or full, to demonstrate how your development helps meet the broader climate change challenges and the move towards net zero.

Please note: the size of the box does not indicate the length of response required. Please cross reference other submitted documents where appropriate.

	Question	Answer (with explanation or reference to where the required information can be found in the planning application)
1	Renewable/low carbon energy and working to Net Zero	
	(JDMD policies DM8 and DM7, SECH policy CS2-J, FHCS policy CS4)	
1.1	What on-site renewable and low carbon technologies are proposed as part of this development?	
1.2	What form(s) of energy will be supplied to the development?	
1.3	Are off-site measures proposed to off-set the carbon footprint of the development? Please specify.	
2	Additional Energy Information	
	(JDMD policies DM8 and DM7, SECH policy CS2-J, FHCS policy CS4)	
2.1	If possible, please provide confirmation of the Dwelling Fabric Energy Efficiency (DFEE) rate in comparison to the Target Fabric Energy Efficiency (TFEE) rate as identified through Standard Assessment Procedure (SAP) calculations. Note: residential development only	

2.2	<p>Please provide details of anticipated carbon emissions, with specific reference to percentage improvement reductions over Part L of the Building Regulations 2013.</p> <p>Where possible this should be demonstrated through supply of relevant SAP/SBEM outputs detailing the anticipated percentage reduction of the Dwelling Emission Rate (DER) or Building Emission Rate (BER) over the Target Emission Rate (TER). SAP/SBEM outputs should be prepared by a suitably qualified individual.</p>	
2.3	<p>What are the processes and quality controls that will be put in place to monitor building performance to ensure performance is as expected?</p> <p>This may refer to internal processes and quality controls, use of a recognised quality regime, or more specific arrangements.</p>	
3.	<p>Waste</p> <p>(JDMPD policies DM2-m and DM7, SECS policy CS2-J, FHCS CS4)</p>	
3.1	<p>Please provide a copy of the Surface Water Management Plan (SWMP) if one has been drawn up.</p>	
4.	<p>Access and movement</p> <p>(JDMPD policies DM2-k, DM22-h, and DM45, SECS policy CS2-J)</p>	
4.1	<p>For new residential development proposals and non-residential developments of less than 1,000m², what other measures are proposed for the development to reduce the length and number of car journeys and traffic levels (for example green travel plan)?</p>	

Checklist C - sustainable development checklist for householder development proposals

The following checklist applies to all proposals for householder development.

Householder development proposals are applications to alter or enlarge a single dwelling, including works within the boundary or garden such as extensions, conservatories, loft conversions, dormer windows, garages, car ports and outbuildings. Please note that planning permission is not needed for all household building work. Under permitted development rules a number of household building work projects are permitted provided they meet certain limits and conditions. Please visit the [Planning Portal](#) to find out whether planning permission is needed.

Proposals to alter or enlarge more than one dwelling, or in relation to flats and maisonettes, will require the submission of a full planning application (see Checklist B).

This checklist has been drawn up to identify the things that could make householder development more sustainable.

This form should be completed and submitted with your planning application form to assist the local planning authority in assessing whether your proposal is acceptable.

Please answer the following questions in relation to your development:

1. In what ways will the development make the best use of the sun's energy to reduce energy requirements? For example: south facing living room windows.
2. How do the design, materials, insulation and construction techniques of the proposed development maximise the opportunities for energy saving?
3. What renewable and low carbon technologies are proposed as part of this development?

4. How has the building or extension been designed to enable low carbon solutions and climate resilience measures to be easily added in the future? For example: space for battery storage or water tanks for air source heating systems.

5. Does the development use permeable materials for hard standings or parking areas to reduce surface water run-off and evaporation?

6. Does the development include the installation of water-efficient fixtures and appliances to conserve water (for example: special showers, taps, cisterns) and equipment to recycle water (for example: rainwater butts).

7. Does the development re-use any water for internal use? For example: grey water recycling?

8. Does the development preserve existing trees, hedges and other natural features? Please note any loss of these features referring to a plan if necessary.

9. Does the proposal use landscaping and natural features externally which will increase biodiversity, for example: planting native species, or species attracting wildlife and including water features? Please provide details.

10. Do any hard boundary treatments include features to ensure permeability for wildlife? For example: hedgehog holes.

11. Does the development consider the need for adequate storage for cycles and domestic recycling facilities?

12. Is electric vehicle (EV) charging infrastructure proposed as part of the development?

13. Do the proposals include any adaptations or installations for climate change to the existing building(s) on the site?

Appendix 3 – references and further guidance

- National Design Guide MHCLG 2019 [National design guide.pdf \(publishing.service.gov.uk\)](#)
- [Building for a Healthy Life, Homes England 2020](#)
- [UK Housing: fit for the Future? February 2019 Committee on Climate Change](#)
- [The New Homes Policy Playbook, January 2021 UK Green Building Council's \(UKGBC\) Advancing Net Zero Programme](#)
- [Local Authorities and the Sixth Carbon Budget CCC Dec 2020](#)
- This website is managed by the Association of Environmentally Conscious Builders (AECB) they are a good resource and have examples of retrofit projects.
- [Low Energy Buildings | Retrofit for the Future](#)
- This is a pdf document to download free following registration Good Homes Alliance – [Overheating in new homes](#) – tools and guidance for identifying and mitigating early-stage overheating risks in new homes.
- Suffolk Flood Risk Management Strategy [Layout 1 \(greensuffolk.org\)](#)
- [Suffolk Guidance on development and flood risk | Suffolk County Council](#)
- [Suffolk Design Streets Guide 2022](#)
- [Suffolk Climate Change Partnership – Green Suffolk](#)
- [Suffolk Climate Emergency Plan](#)
- [Suffolk Climate Emergency Plan Technical Report](#)
- [Net Zero toolkit \(Suffolk\)](#)
- See [At Home – Green Suffolk](#) for what residents can do – energy, water, carbon footprint, grants, and green travel + guidance pdfs on: What risk to Suffolk; Summary of climate change risks to East of England; Your home in a changing climate (Arup 2008); Adapting for tomorrow Environment Agency 2009), Adapting to climate change; (Defra, 2008); Living on the Edge (Environment Agency 2012); and Climate change 20 questions (RSPB)
- The carbon footprint calculator on the green Suffolk website see [Calculate your carbon footprint](#)
- [Greater south east energy hub](#)
- The **London Energy Transformation Initiative** (LETI) website has useful guidance documents, and their resources are used all over the country [Home | LETI](#)
- Local Energy East [LEE-Energy-Strategy.pdf \(energyhub.org.uk\)](#)

- [The Energy Saving Trust](#) for home energy advice, energy tools and calculators and guide to energy performance certificates.
- **The low energy building database** [Low Energy Buildings | Retrofit for the Future](#) – a repository of low-energy building information created to help inform the planning and development of low energy new build and refurbishment.
- **Passivhaus** is explained on their website: [Passivehaus Trust – What is Passivehaus?](#)
- [BREEAM Home Quality Mark](#)
- [Code for Sustainable Homes](#) Technical Guide – although published in 2010 and no longer used by the government it can be used as a holistic approach to building sustainable homes.
- The first part of moving towards [The Future Homes Standard](#) is the publication in 2021 of draft changes to Part L of the Building Regulations, a set of standards that will ensure that all new homes constructed from 2025 will produce 75 to 80 per cent less carbon emissions than homes delivered under current regulations.
- Historic buildings – please see the guidance produced by Historic England [Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency | Historic England](#)
- [Know your home know your carbon Historic England 2020](#)
- [Save water \(anglianwater.co.uk\)](#)
- [Environment Agency - Water stressed areas Final classification 2021](#)
- [Five articles on water saving \(www.greenbuildingstore.co.uk\)](#)
- [Suffolk Guidance for Parking](#)
- [What is MVHR Heat Recovery Ventilation? - Information Hub Green Building Store](#)
- [Active Travel Online Portal | Active Travel Information](#)
- Developer checklist [Building Sustainable Transport into New Developments \(defra.gov.uk\)](#)
- Active travel tool kit slide pack [PowerPoint Presentation \(sustrans.org.uk\)](#)
- Travel Plan guidance [Travel plans for new or expanding developments | Suffolk County Council](#)
- [Suffolk Wildlife Trust](#)
- [Suffolk's Nature Strategy](#)
- [Suffolk Biodiversity Information Service](#)
- [Chartered Institute of Ecology and Environmental Management](#)
- [Circular 06/2005](#)

- [Natural England](#)
- [Home composting](#)
- [Recycling plastic](#)
- [Designing out waste](#)
- [BRE Green Guide to Specification](#)

Other local authorities' local plan policies, supplementary planning documents (SPDs) and guidance:

Lewes District Council – [Sustainability in Development Technical Advice Note](#)

Greater Cambridge [Greater Cambridge Sustainable Design and Construction SPD - Cambridge City Council](#)

Greater Cambridge [Local Plan – First Proposals 2021 Topic Paper Climate Change](#)

Bristol City Council [Climate Change and Sustainability Practice Note 2020](#)

Cornwall Council [Climate Emergency DPD \(Reg 19 Submission draft February 2021\)](#)

Salford [Local Plan Chapter 5](#) – see Policy CC1 and the monitoring indicators box and references

Derbyshire Dales [Climate Change SPD 2021](#)

Reading Borough Council [Sustainable-Design-and-Construction-SPD-Adopted-December-19.pdf \(reading.gov.uk\)](#)

Somerset West and Taunton – [Climate Positive Planning Interim Guidance Statement on Planning for the Climate Emergency](#)

Wiltshire Council Local Plan – [Looking to the Future: Addressing climate change and biodiversity net gain through the Local Plan – raising the ambition January 2021](#)

Guildford Borough Council supporting evidence for the [local plan adopted 2019](#) and [Climate Change, Sustainable Design, Construction and Energy SPD](#) September 2020 – [Assessment of the Viability of Carbon Emission Targets for New Builds](#) Evora Edge, April 2017 This report considers the opportunity to lower carbon emissions of new buildings. It examines both cost and viability of lowering emissions by the following amounts: 10%, 15%, and 20% below Building Regulation standards. It is a very technical document but it helps to explain the following terms: Target Emission Rate (TER), Building Emission Rate (BER), Dwelling Emission Rate (DER), Standard assessment procedure (SAP), Target Fabric Energy Efficiency (TFEE), Dwelling Fabric Energy Efficiency (DFEE), and Simplified Building Energy Model (SBEM)