

Initial Consultation Statement

Sustainable Construction
Supplementary Planning Document

November 2021



Contents

- 1 Introduction 1
- 2. Who was consulted? 1
- 3. How were they contacted? 1
- Appendix 1 – Initial Consultation 4

1 Introduction

The Sustainable Construction Supplementary Planning Document will provide guidance on a range of topics including energy efficiency, renewable energy, water conservation, sustainable transport and use of materials, to support the implementation of the Local Plan policies.

The Sustainable Construction SPD will be a material consideration in the determination of planning applications and, once adopted, will replace the [Renewable Energy and Sustainable Construction SPD](#) (September 2013, which relates to the former Waveney Local Planning Authority area only).

This Consultation Statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the Draft SPD which was held between 1st November and 13th December 2021. The statement outlines the initial consultation that has been undertaken to inform the preparation of the SPD.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement¹.

2. Who was consulted?

A range of organisations were contacted as part of the initial consultation, including Town and Parish Councils, developers and agents and environmental and interest organisations.

3. How were they contacted?

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

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

The consultation was advertised on the Council's website, as well as on social media. A questionnaire, providing some background to the consultation and asking a series of questions, was published on the Council's website. Town and parish councils, elected members and other organisations referred to above were notified directly by email or post.

¹ Statement of Community Involvement - How to get Involved in Local Planning (April 2021)

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

The consultation asked the following questions:

1. Do you consider that the proposed content is appropriate?
Yes/No
If no, please suggest how the scope and content should be amended.
2. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD](#) (2013) that should be retained?
Please provide details.
3. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD](#) (2013) that should **not** be retained?
Please provide details.
4. Are there any specific elements of the Local Plan policies that you consider require further guidance in the document?
If yes, please explain what guidance is required.
5. Are there any elements of national policy on sustainable construction that you consider require additional guidance in the document?
If yes, please explain what guidance is required.
6. What specific sustainable design and construction measures do you consider could be incorporated in developments of 10 or more new dwellings?
7. What specific sustainable design and construction measures do you consider could be incorporated in new commercial properties of 1,000sqm gross floorspace or more?
8. Do you have any views on sustainable design and construction that you consider should be addressed in the document?
9. Do you have any views the Council's [Environmental Guidance Note](#) being included as an Appendix within the SPD?
10. Are you aware of any good practice from elsewhere that could be applied in East Suffolk?
If yes, please provide details.
11. Are you aware of any examples of good sustainable design and construction in East Anglia that could be used as a case study within the Sustainable Construction SPD?

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

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

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

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

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

Appendix 1 – Initial Consultation

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

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

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

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

	charging points at workplaces would help to meet the needs of electric vehicle owners with longer commutes.	
Bawdsey Parish Council	<p>The respondent suggests that there should be more best practice examples relating to larger scale housing developments. Reference is made to the RTPI's 2018 guide 'Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change', including a number of suggestions for setting ambitious climate change policies including policies to improve on Building Regulations energy efficiency standards.</p> <p>Highlights the importance of the language used in the SPD - 'could', 'should' and 'may' versus 'must', 'will' and 'shall'.</p> <p>It is suggested that the SPD should be very encouraging of anaerobic digestion proposals for biogas. Case study of Bentwaters and the use of biogas to fuel public transport in Sweden provided.</p> <p>It is suggested that encouragement and guidance should be provided in the SPD on maximising south-facing roof surface area for optimising the use of PV panels. Respondent feels very strongly that developers have a duty to at least provide the opportunity (through unit design) for the installation of PV panels and solar heating at a later date (retrofitted), if not included for in the original unit design.</p>	<p>The SPD cannot create new policies. The Local Plans both contain policies on Sustainable Construction which the SPD will provide guidance on. Policy SCLP9.2 Sustainable Construction of the Suffolk Coastal Local Plan sets out policy securing a 20% increase in energy efficiency above Building Regulations requirements on developments of more than 10 dwellings. Policy SCLP9.2 and Policy WLP8.28 Sustainable Construction both require BREEAM 'very good' for certain non residential; developments. Both policies also require all new development to meet the higher water use standard of 110 litres per person per day.</p> <p>As the SPD is providing guidance it cannot require development to meet certain standards that are not set out in the adopted Local Plan policies.</p> <p>Chapter 6 provides guidance in relation to anaerobic digestion proposals and reference to south facing roofs to support solar generation is included in the section on Siting, Form and Orientation.</p>
Saxmundham Town Council	There should be a section about wildlife friendly design such as fences that allows hedgehogs and frogs to move between gardens.	This guidance has been incorporated into Chapter 8 Natural Environment of the Draft SPD.

<p>Anonymous Respondent 5</p>	<p>The SPD should provide guidance on Policy WLP8.24 of the Waveney Local Plan.</p> <p>Anglian Water will be looking to develop more renewable energy from wind and solar so guidance should not be limited to community led schemes.</p> <p>Water conservation and sustainable drainage should appear as one chapter to link water re-use measures with SuDS.</p>	<p>Chapter 2 on Water Efficiency and Management in the Draft SPD provides guidance relating to Policy WLP8.24.</p>
<p>Peter Freer, Suffolk County Council</p>	<p>The County Council is pleased with the proposed content and supports its purpose.</p>	<p>Support for the content is appreciated.</p>
<p>Pigeon Investment Management representation from Turley</p>	<p>The respondent supports the content of the SPD but believes other issues should also be consider including:</p> <ul style="list-style-type: none"> - The SPD should incorporate sufficient flexibility to take individual site constraints into consideration recognising the need the to efficiently deliver new housing and impact of additional financial requirements - It is also important to recognise the requirements of Town and Country Planning Regulations (2012) in respect of the relationship between Local Plans and SPDs, with the role of SPDs to provide further guidance on particular matters or sites, and should not be used to introduce new requirements which are not set out in the Local Plan. - It is important that the SPD confirms that the Future Home Standard (FHS) will supersede local policy once adopted. It is also important for the SPD to recognise that the method of 	<p>Support for the content is appreciated.</p> <p>Planning Policies in the Local Plans provide sufficient flexibility and the whole of the Local Plans have been viability tested.</p> <p>The requirements of the Town and Country Planning Regulations (2012) have been considered.</p> <p>Reference to the planning policies being impacted by Future Home Standard is made in Chapter 12 Making a Planning Application.</p> <p>Site allocations and planning policies in the have been viability tested as part of the whole Local Plan. Planning Policies SCLP9.2 Sustainable Construction and WLP8.28 clearly state that exceptions should only apply where they are expressed in the Building Regulations or where</p>

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

2. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD \(2013\)](#) that should be retained?

Please provide details.

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

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

Please provide details.

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

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

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

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

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

Respondent	Summary of comments	Council response
Felixstowe Town Council	Request for guidance on understanding the interaction of the NPPF, Building Regulations and other relevant public policy to sustainable construction when considering planning applications.	The SPD refers to the relevant parts of the NPPF and the Building Regulations where applicable. The role of the Building Regulations is, in particular, set out in relation to implementing the planning policies on water use and energy efficiency.
Bawdsey Parish Council	Reference should be made to national matters covered in the RTP1's 'Rising to the Climate Crisis / A Guide for Local Authorities on Planning for Climate Change'.	National planning policy is set out in the National Planning Policy Framework which is referenced in the document where relevant.

Pigeon Investment Management representation from Turley	Pigeon believe that the SPD could be simplified by deferring all matters relating to energy and carbon reductions to the Building Regulations. This action would avoid duplication of resources to meet similar policies at both a national and local level.	The Future Home Standard has been taken into consideration when developing the SPD. Guidance has been provided on energy and carbon reduction for those wish to maximise opportunities and exceed the requires of the Building Regulations.
Paul Cobbold	<ol style="list-style-type: none"> 1. Reduced heat load 2. Air tightness standards 3. Solar shading and how best to achieve it effectively 4. Modern methods of construction and move away from traditional building practices 5. MVHR in most new dwellings to improve air quality and ventilation 6. Put more emphasis on quality of construction rather than quantity to eliminate the "performance gap" 	The Council does not set national Building Regulations. However, the Draft SPD provides guidance on energy efficiency in chapter 3, solar gain and shading in chapter 6, methods of construction in chapter 10 and renewable and low carbon technologies in chapter 9.

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

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	<p>The respondent would like the following content added to the scope of the SC SPD:</p> <ul style="list-style-type: none"> • Shared communities gardens • Shared communities allotments • Shared recycling facilities, especially for glass • Shared secure bicycle lock-ups and/or secure bicycle lock-up facilities at the front of properties 	The provision of such communal garden areas and allotments is incorporated in Chapter 8 on the Natural Environment. The Sustainable Development checklist in Appendix D refers to the provision of secure on-site cycle storage, as does Chapter 11 on Healthy Buildings and Places.

Felixstowe Town Council	Sustainable construction should be site wide, not individual dwellings basis.	The draft SPD contains guidance that applies at the site level such as in relation to healthy places (Chapter 11) and drainage (Chapter 2). It is appropriate for energy efficiency requirements to be required at individual building level in order that this can be implemented through Building Regulations in accordance with Policy SCLP9.2.
Bawdsey Parish Council	BREEAM Level 4 or BRE HQM standards, which demand serious consideration for the inclusion of Renewable energy facilities or Passivhaus principles.	Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Westerfield Parish Council	For developments of 10 or more dwellings serious consideration should be given to incorporating sustainable design and construction measures for the whole complex. It is reasonably economical to incorporate these within a development compared to single properties and greater requirements should be applied to larger developments.	Policy SCLP9.2 Sustainable Construction in the Suffolk Coastal Local Plan requires all new developments of more than ten dwellings to result in a 20% reduction in CO2 emissions below the Building Regulations. Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Water Management Alliance	Drainage Hierarchy/SuDS/Sustainable drainage solutions.	Chapter 2 on Water Efficiency and Management contains guidance on drainage and SUDS.
Boyton Parish Council	All new developments and conversions should be required to incorporate on site renewable energy generation. Roof top solar should be possible for most new dwellings.	The SPD cannot set new policy but can only provide guidance on existing policies.
Pigeon Investment Management representation from Turley	Pigeon believes the viability of implementing the sustainability measures within the SPD is somewhat (although not exclusively) linked to low housing delivery. Pigeon requests flexibility to respond to site specific constraints and consideration of green infrastructure, secure design, accessibility, sustainable transportation and social infrastructure.	The SPD does not introduce new planning policy requirements. All policy requirements are contained in the adopted Local Plans which have been subject to whole plan viability testing. A range of sustainability measures are provided in the SPD to allow a flexible approach.

Paul Cobbold	All new dwellings should use a heat pump rather than oil or gas. PV on many more new houses. Higher build and design standards as mentioned above.	The Council does not set national Building Regulations. However, the SPD provides guidance on renewable and low carbon technologies in chapter 9.
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7. What specific sustainable design and construction measures do you consider could be incorporated in new commercial properties of 1,000sqm gross floorspace or more?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	Provision of secure bicycle lock-up facilities at should be provided at the front of properties.	Chapter 11 on Healthy Buildings and Places refers to the provision of secure cycle parking. Whilst this should be easily accessible the front of the house may not always be the best location.
Bawdsey Parish Council	BREEAM Level 4 or BRE HQM standards, plus consideration for economies of scale opportunity to incorporate community heating infrastructure like Ground Source Heating etc.	Policies SCLP9.2 and WLP8.28 in the Council's Local Plans set requirements for BREEAM to be met for certain non residential developments.
Westerfield Parish Council	Use of ultra-low carbon products should be a requirement and other alternative products to concrete.	Chapter 4 of the draft SPD sets out that concrete use should be minimised and suggests alternatives that are more sustainable.
Water Management Alliance	Drainage Hierarchy/SuDS/Sustainable drainage solutions	Chapter 2 on Water Efficiency and Management contains guidance on drainage and SUDS.

Boyton Parish Council	All such properties should be required to incorporate on site renewable energy generation. Roof top solar should be possible for most new dwellings.	The SPD cannot set new policy but can only provide guidance on existing policies.
Pigeon Investment Management representation from Turley	<p>Pigeon supports the threshold of buildings of 1,000 sqm for applying the BREEAM standard however other factors may affect the technical and commercial viability of the BREEAM standard. Pigeon believe that the SPD should consider this flexibility when applying the BREEAM standard if evidence is provided by the sustainability statement.</p> <p>The SPD must recognise the need for flexibility with the application of the BREEAM standard particularly for any buildings that may require a significant element of refurbishment.</p>	Local Plan policies state BREEAM applies unless it can be demonstrated that it is not viable or feasible to do so. The SPD does not seek to change exiting planning policy in the Local Plans.

8. Do you have any views on sustainable design and construction that you consider should be addressed in the document?

Respondent	Summary of comments	Council response
Bawdsey Parish Council	The Council is expected to have strong ideas on what is required to meet Government targets.	Comment noted.
Westerfield Parish Council	Effect on the environment from traffic generation should be considered and the whole life environmental sustainability.	The Sustainable Development checklist in Appendix D includes a section on sustainable transport. The Council is also producing a cycling and walking strategy to help to secure improvements for cycling and walking.

Pigeon Investment Management representation from Turley	Pigeon have presented a number of issues for consideration within Question 1 of this document which we believe are also applicable to question 8.	Comment noted.
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9. Do you have any views the Council's [Environmental Guidance Note](#) being included as an Appendix within the SPD?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	The respondent felt that the Environmental Guidance Note would be valuable to include.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
Bawdsey Parish Council	The Environmental Guidance Note must be given obligation and purpose.	The Environmental Guidance is not a Supplementary Planning Document and therefore does not have statutory weight but is promoted by the Council as a guidance note which can apply beyond Planning.
Westerfield Parish Council	It should be included as an appendix.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
Boyton Parish Council	It makes sense to do this.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.

Pigeon Investment Management representation from Turley	Pigeon have no objection to the inclusion of the Environmental Guidance Note within the SPD provided that it is made clear that the note is for guidance only and that only the requirements within the SPD are adopted policy, superseding this Guidance Note. The guidance note contains references to standards such as Passivhaus and the Home Quality Mark which have significant commercial and technical requirements which have not been tested and approved within adopted policy.	Having reflected on the format of the SPD, a link to the Environmental Guidance Note has been included in Chapter 1.
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10. Are you aware of any good practice from elsewhere that could be applied in East Suffolk?

Respondent	Summary of comments	Council response
Gooch, Cllr Louise (East Suffolk Councillor for Pakefield and Kirkley)	The respondent felt modular low-carbon eco-housing represented good practice that could be encouraged more in East Suffolk.	Guidance on modular building is included in chapter 10.
Bawdsey Parish Council	ESC lacks the expertise and knowledge to advise on such areas and therefore a local independent consultant should be used.	A number of examples and case studies have been sourced, to illustrate the guidance through the use of photographs and illustrations.
Boyton Parish Council	Good practices should be required in local policy.	The SPD cannot set new policy but can only provide guidance on existing policies.

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

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

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

Pigeon Investment Management representation from Turley	Please see our response to Q10 above.	Comment noted.
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12. Please let us know if you have any other comments.

Respondent	Summary of comments	Council response
Historic England	<p>Historic England welcome the inclusion of a section in the SPD on the historic environment.</p> <p>It is pointed out that listed buildings, buildings in conservation areas and scheduled monuments are exempt from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance and that special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. A link is provided to Historic England's guidance '<i>Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to Historically and Traditionally Constructed Buildings</i>' (2017).</p>	<p>A chapter on the historic environment has been included in the Draft SPD which largely refers to the detailed guidance in the Historic Environment Supplementary Planning Document which was adopted in June 2021.</p> <p>Reference to Building Regulations exemptions is noted, however as more detail is provided in the Historic Environment SPD it is not considered necessary to introduce this detail in this SPD.</p>

Broads Authority	<p>Suggestion to include reduction of light pollution, linked to reducing energy use.</p> <p>For large scale renewable energy developments the impact on the setting of the Broads must be considered. Early engagement with us on any schemes near to our boundary would also be appropriate.</p>	<p>Light pollution is covered in Chapter 8 on the Natural Environment and in Chapter 11 on Healthy Buildings and Places.</p> <p>Chapter 8 on the Natural Environment explains the policy approach to protecting the landscape of the Broads.</p>
Ipswich Borough Council	Ipswich Borough Council do not wish to comment at this time.	Comment noted
Westerfield Parish Council	Please to note the comprehensive proposals and look forward to consideration of the draft SPD.	Comment noted.
Water Management Alliance	Reference should be included to internal drainage boards and their role within planning process. A link is provided to the Water Management Alliance Planning and Byelaw Strategy.	Chapter 2 of the Draft SPD covers Water Efficiency and Management and provides a link to the strategy and guidance produced by the Lead Local Flood Authority which contains information on Internal Drainage Boards.
Natural England	Natural England does not have any comments to make on the Sustainable Construction SPD.	Comment noted
Anonymous Respondent 1	Any steps to mitigate future climate change problems should be introduced. If Building Regulations are not sufficient than any changes to planning to improve energy efficiency should be taken.	Policies SCLP9.2 and WLP8.28 in the Local Plans set policy for energy efficiency measures, in places going above the Building Regulation requirements. The SPD provides guidance on implementing these policies.
Anonymous Respondent 2	<p>Respondent supports:</p> <ul style="list-style-type: none"> • a presumption that brownfield sites will be developed first; • refurbishment and retrofitting over demolition; • streets rather than cul-de-sacs; 	The Local Plans allocate brownfield sites for development as part of a mixed approach which also involves greenfield development in acknowledgment of the limited scope for brownfield in a predominantly rural district.

	<ul style="list-style-type: none"> • green roofs; • rainwater recycling; • a presumption in favour of leaving and building around existing trees, hedges and ponds; • design for playing outside; • imaginative eco-design and traditional design; • Hedgehog holes, swift boxes and similar and Wildlife-friendly landscape design; <p>More community consultation and architectural solutions, defined by “commodity, firmness and delight”.</p>	<p>Chapter 3 on Material promotes reusing existing buildings over demolition.</p> <p>The Sustainable Development checklist in Appendix D of the Draft SPD sets out questions relating to sustainable travel.</p> <p>Water saving measures are set out in Chapter 2 on Water Efficiency and Management.</p> <p>Chapter 8 on the Natural Environment includes guidance on the provision of wildlife friendly features such as hedgehog holes and landscaping that is wildlife friendly.</p> <p>The Council will also be producing a Healthy Environments SPD which provides an opportunity to provide guidance on such topics as play space, and this forthcoming SPD is referenced in Chapter 11 on Healthy Buildings and Places.</p>
<p>Anonymous Respondent 3</p>	<p>All deciduous indigenous trees should be protected, so that they can only be felled in exceptional circumstances.</p> <p>Driveways should not be paved and artificial turf should not be used.</p>	<p>The benefits of trees are highlighted in the SPD such as in Chapter 8 on the Natural Environment, however the SPD cannot be used to amend legislation relating to the protection of trees.</p> <p>Permeable paving is supported in Chapter 2 on Water Efficiency and Management.</p> <p>Guidance discouraging artificial lawns is contained in Chapter 8 on the Natural Environment.</p>

Anonymous Respondent 4	Concern raised over the impact on wildlife on the site when development takes place.	The Local Plans contain policies on the natural environment which seek to protect and enhance the natural environment and that seek net gains for biodiversity. Chapter 8 of the Draft SPD sets out guidance on incorporating measures into new development to better integrate nature into development.
Anonymous Respondent 6	Comments that the majority of the cost of installing domestic PV panels is in the scaffolding and installation labour, and these should therefore be compulsory on new builds along with better insulation. Solar water heating should also be required. Air source heat pumps should be required rather than gas boilers. Net zero in Suffolk by 2030 will need these urgently.	The SPD cannot set new planning policies, above those set out in the Local Plan. However the SPD provides encouragement for installing renewable energy as part of complying with the policies on sustainable energy.
Anonymous Respondent 7	Comments that all developments should comply with zero-carbon construction and that renewable energy generation is long overdue.	The SPD cannot set new planning policies, above those set out in the Local Plan, however provides guidance on meeting the energy elements of the policies in the Local Plans and provides guidance to support renewable energy generation.
Anonymous Respondent 8	<p>Comments that provision should be made for wildlife and suggests hedgehog tunnels/holes, wild-life friendly ponds, indigenous species of hedgerow, nesting sites and trees.</p> <p>Comments that all construction should have solar panels.</p>	<p>Chapter 8 of the draft SPD relates to the Natural Environment and provides guidance on incorporating wildlife-friendly measures.</p> <p>The SPD cannot set new planning policies, above those set out in the Local Plan, however provides guidance on meeting the energy elements of the policies in the Local Plans and provides guidance to support renewable energy generation.</p>
Anonymous Respondent 9	<p>Respondent submitted the following link to the 'Purple Turtle Co' blog:</p> <p>https://purpleturtleco.com/blogs/news/sustainable-cities-and-their-goals-for-the-future</p>	Comment noted. The SPD is seeking to promote Sustainable Construction and help to ensure the implementation of the Council's policies on sustainable construction.

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

	All new buildings having roof-mounted PV panels (commercial and domestic)	Planning Policy cannot required roof-mounted PV panels but support and information for PV panels is provided in Chapter 9.
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