

SUSTAINABILITY AND ENERGY STATEMENT

Local Policy Framework

Core Strategy - Policy CP1 requires that, amongst other things, development should :”Contribute towards the goal of reaching zero-carbon developments as soon as possible by:

- a) Including appropriate on-site renewable energy features; and
- b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

Managing Development Delivery DPD - Policy CC04: Sustainable Design and Construction states that: “Planning permission will only be granted for proposals that seek to deliver high quality sustainably designed and constructed developments by:

1. in respect of all new homes:

- a) Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4;
- b) Meet internal potable water consumption targets of 105 litres or less per person per day (as part of the requirement to meet full Code for Sustainable Homes Level 4).

2. All new non-residential proposals of more than 100 sq m gross non-residential floorspace shall at least:

- a) Achieve the necessary mandatory Building Research Establishment Assessment Method (BREEAM) requirements or any future national equivalent
- b) Meet or exceed statutory requirements for water resource management.

3. All development, including conversions, alterations and extensions shall incorporate suitable waste management facilities, including on-site recycling.

Comment:

Policy CC04 is a positively worded policy and, therefore, non-compliance would not of itself justify a refusal of planning permission. It is primarily intended to address the construction of new dwelling houses, or the construction of non-residential buildings exceeding 100 sq.m in floor area. Neither of these criteria apply in this case.

Sustainable Design and Construction Supplementary Planning Document (SPD) - states that a Sustainability Statement is required for the following developments:

- Residential development – involving the creation of a new dwelling (including replacement dwellings where this involves substantial, or complete demolition of the existing house);
- Non-residential development – over 100m² floorspace.

Comment:

Again, not relevant to an application for a Gypsy/Traveller caravan site where there are no new dwellings or, non-residential buildings to be constructed exceeding 100 sq.m of floorspace.

Assessment of the Sustainability of the Development

The SPD makes clear that, in any event, the level of information should be proportionate to the scale of the proposed development. Appendix 4 of the document sets out a checklist of key considerations to be taken into account when measuring and demonstrating sustainability. I address each of the key considerations, in turn, below:

Sustainable Design and Energy Efficiency:

- Has the development been designed to optimise the use of energy from the sun? *Not relevant for a caravan site.*

- Has the development been designed to optimise natural ventilation? – *See below.*
- How will the design of the building make efficient use of energy? (e.g. levels of insulation).

Modern mobile homes are built to residential standard BS3632, which requires a high level of thermal and acoustic insulation. Such homes are naturally ventilated.

- Has the development met the necessary mandatory Code for Sustainable Homes/ BREEAM level requirements? – *Not relevant*
- Has the development considered being built to a level above the mandatory Code for Sustainable Homes/ BREEAM requirements? i.e. Code Level 4 – *Not relevant*
- For mixed use developments, have you contacted the BRE who could help produce a bespoke assessment? – *Not relevant*

On-Site Renewable/ Energy Generation

- How has the generation of energy from decentralised, renewable or low carbon technologies been considered? *Not relevant to a caravan site.*
- How will the development (where viable) incorporate decentralised, low carbon or renewable energy technologies to satisfy the at least 10% requirement (for major development) of Policy NRM11 of the South East Plan?
- *Policy no longer in existence.*
- Has an energy statement been produced to satisfy the requirements of the Developers Guidance note for the 10% renewable Energy requirement of the South East Plan policy NRM11? - *Policy is no longer in existence.*

Water Resource Management

- How will the development incorporate the use of water saving devices to achieve water efficiency? *Development already completed.*

- Has the development considered incorporating water efficiency measures to achieve internal potable water consumption of 105 litres per person per day? – *Development already completed.*

- How will the development incorporate harvesting and reuse of rainwater? -

The discharge of roof drainage from the proposed mobile homes and amenity building to properly constructed soakaways, would help to ensure that the rate of surface water run-off would not exceed the greenfield run-off rate.

Notwithstanding the above, surface water run-off would be attenuated by the provision of 210 litre water butts for each of the mobile homes and amenity building, fed by a diverter in line with the rainwater downspout. They would reduce the rate of surface water run-off, whilst also providing a source of non-potable water for use by the site residents, i.e. for watering plants and washing vehicles.

- How will the development incorporate the reuse, collection and treatment of grey water? - *As above*

- Has the design considered the use of SUDs and how will they be incorporated and maintained in the development?

Flood Risk Management

- Is the development designed to be resilient to flooding? – *Yes, by locating development in Flood Zone 1.*

- Has the development considered the change in flood risk over the lifetime of development because of climate change? *To be addressed in a bespoke Flood Risk Assessment*

- Have all sources of flood risk been considered? *To be addressed in a bespoke FRA.*

- Where required, has a FRA or Surface water Drainage Strategy been produced? *A FRA is to be produced.*

- Has appropriate consideration been given to surface water and drainage issues – including SUDs and green roofs?

- How will the design ensure that run-off from the site will not increase, or where possible be reduced, as a result of the development? *To be addressed in a bespoke FRA.*

Biodiversity

- How have the wildlife habitats and natural features on and adjacent to the site been considered and how will they be retained, protected and enhanced? – *Existing hedgerows have been retained and strengthened.*
- Has an ecological assessment, where a significant impact on biodiversity is likely or probable, been carried out? *No significant impact on biodiversity is likely.*

Waste, Recycling and Composting facilities

- How will the development provide, or have access to appropriate facilities for the storage and collection of waste? – *Domestic waste is collected by the Local Authority.*
- How will the development incorporate provision for on site composting, green waste and sink macerators? *Development already completed.*
- Has an audit of the materials present on the site been conducted with an assessment of the extent to which materials could be reused? – *Not relevant.*
- How will the development make the maximum use of construction and demolition waste? – *The hardstanding areas have been formed by the use of re-cycled waste, in the form of builder's rubble and road planings.*
- How will the development make maximum use of recycled materials? – *As above.*
- How will provision be made for the storage and recycling of waste for all users of the site? – *Local Authority provided bins.*

Sustainable Transport

- Requirement for developments to provide or have existing access to appropriate facilities for secure and covered cycle storage and changing / drying facilities – *Not relevant to a Gypsy caravan site.*

Health, Safety and Well-being

- How will the development address issues of air, noise and light pollution to minimise their impact? *Not relevant.*
- Has evidence been provided on the measures that will enable developers to meet their obligations in respect of land affected by contamination? *Not relevant.*
- Has an assessment of existing levels of pollution been produced, where significant impacts from pollution to or from the proposed development is likely or probable? – *Not relevant*
- How has the design and layout incorporated measures to reduce the need to travel, especially by car, and promoted alternative and sustainable modes of transport such as walking, cycling and the use of public transport? – *Addressed in the Design and Access Statement*

Sustainable Construction

- Will the development use responsibly sourced and recycled materials? - *Development already completed.*
- Will the development use locally sourced materials, preferably within 35 miles? *Development already completed.*
- Will the development achieve a minimum target of 25-30% of roads, pavements, public spaces and car parks to be from locally reclaimed or recycled materials in line with good practice? – *As above.*
- Will the development ensure that any timber comes from certified sources, with a minimum target of 75% expected to be achieved in line with good practice? *As above.*

- How will the selected materials help retain local character, ensure long life and ensure a low environmental impact? *Addressed in the Design and Access Statement.*
- Has a Site Waste Management Plan been completed, if the estimated cost is greater than £300,000 or over excluding VAT? - *Not relevant.*
- If it's major development, how will the development implement a Site Construction Environmental Management Plan and operate under Considerate Constructors Scheme? – *Not relevant as the development is already complete.*