

# Planning Committee

03 December 2021

Agenda item number 14

## December Consultation Responses

Report by Planning Policy Officer

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### Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently, and invites members' comments and guidance.

### Recommendation

To note the report and endorse the nature of the proposed response.

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## 1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 23 November 2021

Appendix 1 – Planning Policy consultations received

# Appendix 1 – Planning Policy consultations received

## East Suffolk Council

**Document:** Sustainable Construction Supplementary Planning Document (SPD)

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

**Due date:** 13 December 2021

**Status:** Draft SPD

**Proposed level:** Planning Committee Endorsed

### Notes

The Sustainable Construction SPD will provide guidance on the implementation of the Council's Sustainable Construction planning policies and other planning policies related to mitigating the impact of climate change. The draft SPD addresses a range of topics including energy efficiency, renewable energy, water conservation, waste and use of materials.

This guidance includes information about how sustainable construction methods and materials used in new development can reduce the construction and operational impact on our environment, wildlife, climate change and health and wellbeing. It also provides guidance on how the operating efficiency of existing buildings can be improved through retrofitting. This document therefore focuses on providing guidance on increasing energy efficiency, water efficiency, the use of sustainable materials, renewable and low carbon energy generation, reducing waste and carbon emissions, nature-based solutions for sustainable drainage systems, designing for future challenges, and designing homes and workplaces that support good health.

The SPD has been drafted following an initial consultation on the proposed scope and content held in March and April 2021. A Consultation Statement has been published alongside the draft SPD which explains how the comments received have been taken into account in drafting the SPD.

### Proposed response

#### Summary of response

The SPD covers a wide range of issues and is well written. There are some detailed comments, in particular the issue of fully glazed façades and mitigating impact they have on dark skies.

#### Detailed comments

Table 3 is very useful, but the figures in 'average water use of each appliance/action' column and 'Building Regulations Maximum fittings consumption to achieve optional requirement level of 110 litres per person per day' column are not directly comparable in some instances. For example, the showers and toilets information are, but the way washing machine and dishwasher is presented is not. It would be useful to clarify so that the columns are directly comparable.

Table 3 – the bath row has confused me. 170 litres is much more than 80 litres. It may be me getting confused, but this row seems to be saying that in order to meet 110l/h/d a bath that can accommodate 170 litres is better than one that can accommodate 80 litres.

Chapter 3: It is great to see an emphasis on re-using existing buildings / materials and a recognition of the embodied energy that they retain. However, I did wonder whether when they go on to cover retrofitting, they should flag up that in historic (pre-1919) buildings, special consideration should be given to the type and method of retro-fitting given the need for the building to breathe etc – whether or not the building is listed. Perhaps this should go in para 3.12 or 3.25 and links to the HE and the Sustainable Traditional Buildings Alliance guidance could also be included:

- [Energy Efficiency and Historic Buildings | Historic England](#)
- <https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/responsible-retrofit-trad-bldgs/>

3.7 – might need to start with ‘this is...’

Page 46 – glass. The image shows an entire façade that is glazed. At night, when internal lights are on, this will result in light pollution, unless it is adequately mitigated through the use of blinds. Internal lighting and glazing can impact dark skies and add to light pollution. I would suggest that this section is caveated along those lines generally, but also in the context of developments that could affect the setting of the Broads that has intrinsic dark skies and is therefore protected through the NPPF. This Guide touches on the issue of internal lighting and glazing: <https://www.southdowns.gov.uk/wp-content/uploads/2021/08/Towards-A-Dark-Sky-Standard-V1.1.pdf> - it may help you improve this section.

Page 48 – In table 3 they suggest that care needs to be taken when retrofitting insulation to historic buildings to ensure that it does not impact on the appearance of the building. I think it should also include that it should be carefully considered so as not to increase damp / condensation which can be a real problem and again perhaps a link to the HE guidance. [Insulating Walls in Historic Buildings | Historic England](#). Again, perhaps more attention should be drawn to the fact that retrofitting works to all historic buildings (whether or not they are listed / have PD rights) should be considered carefully and in line with HE guidance as some works can disrupt the equilibrium of the way in which the building has functioned for its lifetime and cause more harm than good

5.2 – the word ‘be’ is split between two lines

6.6 refers to glazing. As mentioned previously, at night, when internal lights are on, this will result in light pollution, unless it is adequately mitigated through the use of blinds. Internal lighting and glazing can impact dark skies and add to light pollution. I would suggest that this section is caveated along those lines generally, but also in the context of developments that could affect the setting of the Broads that has intrinsic dark skies and is therefore protected through the NPPF. This Guide touches on the issue of internal lighting and glazing:

<https://www.southdowns.gov.uk/wp-content/uploads/2021/08/Towards-A-Dark-Sky-Standard-V1.1.pdf> - it may help you improve this section.

Section 9 – this should refer to impact on the setting of the Broads as well as our [landscape sensitivity study](#).

Appendix A: please could they add the STBA guidance (link above) to their 'Further Guidance' list.

# East Suffolk Council

## Document: Affordable Housing Supplementary Planning Document (SPD)

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

**Due date:** 13 December 2021

**Status:** Draft SPD

**Proposed level:** Planning Committee Endorsed

### Notes

The Affordable Housing Supplementary Planning Document (SPD) will provide guidance on the implementation of the Council's planning policies related to affordable housing. The draft SPD covers a range of matters including types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements and carrying out local housing needs assessments. The SPD has been drafted following an initial consultation that was held in November and December 2020 under which views were sought on the scope and content of the SPD. A Consultation Statement has been published alongside the draft SPD which explains how the comments received have been taken into account in drafting the SPD.

### Proposed response

#### Summary of response

The SPD is welcomed and well written. There is a lack of acknowledgement that it will be of relevance to any scheme in the Broads part of ESC that triggers the need for affordable housing.

#### Detailed comments

Para 1.11 and 1.13 says 'This SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority'. Whilst ESC produced the SPD and you are the LPA for your part and we are for our part, ESC is the Housing Authority for the entire district including that area that is the Broads. Also, the Local Plan for the Broads has a policy on Affordable Housing which defers to/has regard to your adopted Local Plan policy. So, if a scheme were to come in to trigger Affordable Housing (see next point as well) then we would use your policy and use this SPD and work with you as the Housing Authority. So, this section probably needs to say more than it does. Indeed, the Broads Authority may need to endorse the SPD and link to it from our website for the reasons set out above. Please get in touch and we can work up something suitable.

Our adopted policy has a threshold of off-site contributions for schemes of 6-9 dwellings. Noting the above comment, is it worth having a section that refers to our threshold?

# East Suffolk Council

## Document: Cycling and Walking Strategy

<https://storymaps.arcgis.com/stories/cbc57e4a9cc24e4e7d174fb34b1bf0e>

**Due date:** 10 January 2022

**Status:** Draft Strategy

**Proposed level:** Planning Committee endorsed

### Notes

Identifies potential cycling and walking infrastructure opportunities across the district. It provides context and information to support detailed infrastructure proposals. The draft Strategy has been informed by an initial consultation that was held October-December 2020, and includes:

- **Key Corridors** - Key routes between, and through, settlements;
- **Local Plan Site Allocation Recommendations** - Recommendations for Local Plan site allocations;
- **Community Recommendations** - Recommendations submitted to the Council as part of the initial consultation.

### Proposed response

#### Summary of response

The Strategy is welcomed and well presented. There is a lack of mention of the Broads in this document considering that we were involved in its production to some extent and that some of the routes go through the Broads.

#### Detailed comments

It might be worth saying that you have also liaised with us about this Strategy and that we will work with you to promote walking and cycling and where appropriate work with you on delivery of some routes that are in the Broads. You might want to clarify that the strategy applies to all of the district including that area that is the Broads. Indeed, some routes actually go through our area.

Steering group – do you want us to be on that group?

Policy context – would be useful to mention the [Broads Plan](#) and [Integrated Access Strategy](#). Also, that our current Local Plan safeguards some routes and that approach could be used to help implement this strategy.

Para 3.1, 3.8 - and the Broads Authority

We could incorporate the relevant parts into our Integrated Access Strategy and Local Plans. We could endorse this strategy and use it as well. Please get in touch when you are finalising this to discuss our comments and our endorsement and use. We would need the GIS files as well.

When it comes to access through the Broads we should always be pushing for LTN 1/20 as the minimum standard rather than as “best practice”.