1. Introduction

1.1 This Technical Background Document supports the Core Strategy (2011 – 2031) Submission Draft - Part 1 of Babergh’s Local Plan. The principles of sustainable development are at the core of the planning system. This has been reinforced during preparation of the Core Strategy Submission Document with publication of the draft National Planning Policy Framework (NPPF) in July 2011. The Core Strategy aims to strike an appropriate balance between the three elements of planning for prosperity, planning for place, and planning for people. There are some key local considerations which have a particular bearing on this balance such as: the dispersed rural nature of the district; the environmental sensitivity of the district (particularly the Stour and Orwell estuaries); the estuary coastline; the character and fabric of historic towns and villages; the attractions for the district for tourism; the changing nature of work and potential for employment growth; the need for new homes; and need to address all of these considerations within the context of climate change.

This paper provides further detail on:

- Explanation of the approach to using design standards to address CO2 emissions and the use of energy
- Explanation of the approach to renewable and low carbon energy
- Explanation of the importance of and policy for green infrastructure
- Explanation of the strategic approach taken to sustainable development

2. Issues and Options Draft Core Strategy (May 2009)

2.1 The Issues and Options document covered Built and Natural Environment and Sustainability and Climate Change in separate sections. Built and Natural Environment considered the local context, and in terms of landscape character noted that parts of the district are protected through national designation, e.g. Areas of Outstanding Natural Beauty, and other locally important areas are designated as Special Landscape Areas in the 2006 Local Plan. A question was posed seeking agreement with the council’s view that Special Landscape Areas (and ongoing work on Landscape Character Assessment) would be best addressed by development control policies.

2.2 Flood risk was identified as a major consideration for future developments, and three options were set out seeking views on the extent that development should take account of the implications of climate change and the likely impact on flood risk.

2.3 Pollution, specifically air quality was set out as an issue with specific reference to localised areas of concern (part of the A12 and in Sudbury). Three options were proposed:
• Option 1 – locate development away from sources of air pollution and encourage development in locations which minimise the use of the car.
• Option 2 – mitigation measures should be put in place if pollution is identified as an issue in any development.
• Option 3 – develop a specific policy to increase the air quality management to try to improve air quality in the district.

Responses on Built and Natural Environment

2.4 The majority of respondents agreed with the council’s view that Special Landscape Areas should be dealt with in development control policies. Support was expressed for development located in floodrisk areas to contribute towards mitigation, and for considering flood risk based on 50 year climate change predictions. There was support for increasing air quality management as a tool for increasing air quality.

2.5 General comments on this section included the absence of detail on geology and geomorphology, and County Wildlife Sites should be mentioned and shown on the Environmental Map.

2.6 The Sustainability and Climate Change section set the context with PPS1, PPS22 and the RSS requirements, and posed 12 questions including questions on whether a design guide is necessary to provide advice on integrating sustainability into designs; whether and at what level Code for Sustainable Homes and BREEAM should be used for target setting and monitoring; and the requirement and level for renewable energy provision in new developments.

Responses on Sustainability and Climate Change

2.7 All respondents agreed on the need to ensure that future development has minimal adverse effect on climate change. The majority agreed that CfSH and BREEAM should be used for target setting and monitoring; sustainable construction requirement should apply to all development; and national or regional targets should be used for renewable energy provision. General issues raised included the view that local requirements for enhanced sustainability code standards should focus on development areas or specific sites and should be evidence based and viable, and any requirement for on-site provision of renewable energy should be flexible.

2.8 Other issues raised included the view that climate change was not given sufficient prominence; all development should positively contribute to climate change reductions and look at ways of managing demand and promoting alternative solutions; viability of developments should be considered, the development of renewable energy should be encouraged and the policies should result in a robust strategy and not merely thresholds and percentages.

3. Draft Core Strategy – April 2010 (Unpublished Preferred Options plus Issues & Options)

3.1 A Preferred Options Document was prepared following the Issues & Options exercise, but it was not published for consultation as consideration of the document by the Council coincided with the Government’s letter to local authorities in May 2010 to revoke the RSS which urged local authorities to set local targets with their communities. The Council decided that the Preferred Options consultation should not proceed (Babergh District Council Meeting 1st June 2010). Following this, a growth issues document was prepared as the subject of a focused consultation. The Future Growth of Babergh District to 2031 –
the issues, local context and scenarios for consideration, was prepared and consulted on in the autumn of 2010. This document did not include any proposed text or policies on the environment or sustainable development issues.

4. The Core Strategy Submission Draft

4.1 Section 3 of the Core Strategy Submission Draft document deals with the natural and built environment, climate change, renewable and low-carbon energy, and green infrastructure under the umbrella heading of “sustainable development”. The background and policies have evolved from the Issues & Options stage, and were being developed during the early part of 2010 for the Preferred Options stage.

4.2 Following consideration of the responses to the Issues & Options consultation, policies on sustainable development and climate change that address three issues were developed: sustainable design and construction, reduction in carbon emissions, and renewable energy.

Explanation of the approach to using design standards to address CO2 emissions and the use of energy (Policy CS7)

4.3 The 2009 consultation on the Code for Sustainable Homes and the Energy Efficiency Standard for Zero Carbon Homes, “sustainable New Homes – The Road to Zero Carbon” promoted the cutting of CO2 emissions as part of the design process for new development with a target that all new homes would be zero carbon from 2016. The expectation was that this would be implemented gradually through Building Regulations.

4.4 In addition to the Code for Sustainable Homes (CfSH) being developed by government, the construction industry and government bodies and organisations have been working on developing sustainable design standards for all aspects of new developments. ‘Building for Life’ has emerged as the national standard for well-designed homes and neighbourhoods run by a partnership of CABE, the Home Builders Federation and Design for Homes (Note: CABE has been assimilated into the Design Council, and Building for Life can be accessed via the Design Council’s website). Building for Life assessment is based on 20 criteria set out as a series of 20 questions which are used to evaluate the quality of new housing developments under the headings: environment and community, character, streets, parking and pedestrianisation, and design and construction. Along with many other local authorities, Babergh will use the Building for Life standards to assess proposals for new homes. Non-residential developments will be expected to use the Building Research Establishment Environmental Assessment Method (BREEAM), an internationally recognised environmental assessment method and rating system.

4.5 The Core Strategy is not intended to deal with site specific matters, and policies for allocated sites and detailed policies for delivering sustainable design and construction and climate resilient development will be set out in Site Allocations and Development Management DPDs (this will include guidance on the size/scale of development that relevant policies apply to).

Explanation of the approach to renewable and low carbon energy (Policy CS8)

4.6 The holistic approach to designing buildings and whole developments to reduce impacts on the environment and climate change continues with the Policy CS8 on Renewable and Low Carbon Energy. Reducing carbon dioxide emissions is one aspect of addressing climate change issues, and combined with increasing the proportion of energy derived from renewable or low carbon energy sources can make a large contribution to addressing this.
4.7 The East of England Plan, in Policy ENG1 – Carbon Dioxide Emissions and Energy Performance, requires new development to be located and designed to optimise its carbon performance to contribute to meeting regional and national targets for reducing climate change emissions. The policy requires local authorities to “encourage the supply of energy from decentralised, renewable and low carbon energy sources and . . . . . . set ambitious but viable proportions of the energy supply of new development secured from such sources and the development thresholds to which such targets would apply.” The policy set an interim target for new development of more than 10 dwellings or 1000m2 of non-residential floorspace to secure “at least 10% of their energy from decentralised and renewable or low-carbon sources, unless this is not feasible or viable”.

4.8 In the absence of any local evidence to support a higher percentage the RSS target figure has been used. Policies in the Core Strategy will be monitored, and this target will be reviewed in the light of local evidence and the context of national standards and regulations.

4.9 The 2010 Preferred Options draft (that was not the subject of consultation) included an option for what is now Policy CS8 in the Core Strategy Submission Draft. The alternative option was to use majority of the policy wording except the requirement for larger developments to achieve 15% of the predicted carbon reductions of all types of development within the proposal site. Further consideration of this during the following year resulted in inclusion of the requirement for the strategic allocations and larger site to use on-site renewable, decentralised, or low carbon energy sources aiming for the East of England Plan target of 10% rather than an unsupported higher figure.

Explanation of the importance of and policy for green infrastructure (Policy CS9)

4.10 A Consultation Paper on a new Planning Policy Statement: Planning for a Natural and Healthy Environment was published in March 2010. This proposed streamlining and consolidating planning policy relating to: biodiversity and geological conservation; landscape protection, soil and agricultural land quality, and forestry; and coastal access, heritage coast and the undeveloped coast, and a policy change to the strategic provision of green infrastructure.

4.11 Consideration of sustainable design principles and essential infrastructure for new development identified the need to address green infrastructure in a holistic way because of the positive links with climate change mitigation. A separate policy for green infrastructure has been developed within section 3 of the Core Strategy Submission Draft.

Explanation of the strategic approach taken to sustainable development (overarching policy CS10)

4.12 Section 3 of the Core Strategy Submission Draft considers all the elements of sustainable development and the principles of good design. It includes Strategies for Environmental Enhancement, Conservation and Enjoyment of the Historic Environment, and Climate Change that set out spatial and non-spatial policies and actions that the Council intends to take. The policies in this section are intended to provide guidance about development and the considerations which will apply in integrating the components of sustainable development, balancing the interests of an appropriate level of growth and the qualities and characteristics of Babergh district.

4.13 Design (in its widest sense) is the key element to achieving sustainable development, and whilst subsequent Development Management and Site Specifics documents will provide detailed guidance, it is important that the Core Strategy sets out the principles for good and appropriate design that contribute positively to making places better for people.