



Climate Change: Planning Application Assessment Guidance

Introduction

1.1 Hadleigh Town Council is committed to supporting the creation of a sustainable community and supporting the goals of sustainability at county [1], national [2], and international levels [3]. The Council has(will/may) adopted a Sustainability Policy [4] and a Climate Change Action Plan [5] to achieve this.

1.2 In 2019, Hadleigh Town Council declared a Climate Emergency, as did the Suffolk Climate Change Partnership (SCCP), which includes Suffolk County Council [6] and Babergh District Council [7].

1.3 The Council, through its Sustainability Policy, is committed to supporting the community to reduce Hadleigh's carbon footprint with the goal to become a carbon-neutral town by 2030 at the latest.

1.4 The Council's Climate Change Action Plan includes the task of developing and adopting Planning Guidance for the Council's Planning Advisory Committee to use when assessing planning applications. This document is that guidance.

1.5 This guidance is consistent with the spirit of the current National Planning Policy Framework (NPPF) which states: "The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs". [8]

The UK Government has said: "Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking... These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008" [9]

1.6 In drafting this guidance document, input was sought from:

- The Council's Planning Advisory Committee
- The Full Council
- The Council's Proper Officer and Projects & Finance Officer
- The Council's Neighbourhood Plan Sub Committee
- The Babergh Parish Forum – a collection of representatives from parishes in the district
- The Babergh Planning Team
- The SALC Climate Forum

1.7 Once adopted, this Planning Guidance will be a public document.

How the final Planning Guidance should be used

2.1 Once adopted, it is anticipated that this Planning Guidance will be used by the Council's Planning Advisory Committee when assessing planning applications with respect to the environment and climate change. The Planning Advisory Committee will of course take other aspects into account when assessing applications, which this guidance does not cover.

2.2 This guidance will be made available so that developers and other potential applicants can consider it prior to drafting their applications.

2.3 It should be noted that Hadleigh Town Council is not the decision authority on local planning applications. It acts only as one of several consultees that can submit comments to the Planning Authority at Babergh District Council. The final decision is with the Planning Authority.



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2.4 The guidance in this document is general, and so may require interpretation by the Planning Advisory Committee when assessing a particular planning application. It is for the Planning Advisory Committee (only) to interpret and apply the guidance as it sees fit. This guidance does not alter the Planning Advisory Committee's remit and responsibilities, nor does it give any of its responsibilities to another committee or sub-committee.

2.5 It is recommended that the Planning Advisory Committee use the assessment criteria to check that an application addresses the climate change and environmental assessment criteria in this guidance in some form, and to a sufficient degree in the view of the Planning Advisory Committee.

2.6 Where an application does not sufficiently address one or more of the assessment criteria, and the Planning Advisory Committee consider that it should, the Planning Advisory Committee may decide to ask the applicant to supply more information, and/or object, and/or ask for conditions on the application to be considered.

2.7 It is recommended that the Council's Planning Advisory Committee, in its response to a planning application, cite the assessment criteria in this guidance that it thinks are relevant to their response.

2.8 To monitor the usefulness and effectiveness of this guidance, it is recommended that the Council keep a record of planning applications considered by the Planning Advisory Committee, recording the application reference, the committee's response, whether or not this guidance was used in the committee's deliberation, and the ultimate decision by Babergh District Council.

Review

3.1 This Planning Guidance will be reviewed regularly by full Council and any changes agreed and adopted. Reviews are to be scheduled by the Proper Officer.

3.2 The Council's Planning Advisory Committee and Climate Change & Environment Sub-Committee can, and should, feedback to the full Council any suggested changes to this guidance to be considered when the guidance is reviewed by full Council.

Overview of the Guidance

4.1 The guidance is intended to apply to all planning applications which the Planning Advisory Committee considers may have an impact on the environment or carbon emissions. This is expected to be most planning applications.

4.2 Where a planning application may have an impact on the environment or carbon emissions, the Planning Advisory Committee may decide not to apply this guidance if the application falls below a certain threshold in terms of size and scope in terms of potential environment impact and carbon emissions. That threshold is defined in section 6.

4.3 For planning applications involving existing buildings (retrofitting), listed buildings or traditional buildings, addressing all the assessment criteria may be more complex than for applications for new builds. It is recognized that adapting old buildings to address climate change can be complex and, in some cases, expensive. The Planning Advisory Committee may wish to make allowances for applications for existing buildings where reasonable efforts have been made to investigate the costs of adaption. See Section 7. Section 8 of this guidance includes some suggestions for refurbishment and retro-fitting that may apply to such applications.

4.4 The Planning Advisory Committee (or the Proper Officer) are encouraged, where it considers it appropriate, to solicit comments from local and/or national environmental organizations regarding a planning application. It is anticipated that such comments would only be proactively solicited where the planning application involves a significant development or is likely to have a significant environmental impact.



4.5 The Planning Advisory Committee may consider some of the assessment criteria listed in this guidance as not relevant to a particular application. If so, it may ignore those assessment criteria for that application.

Assessment Criteria

5.1 The Planning Advisory Committee should use the following criteria for assessing planning applications with respect to environmental impact and climate change:

1. Design and materials. The application makes clear that the design aims to minimize energy requirements in the design phase (eg. it fulfils Passivhaus standards (see section 8)) and also justifies the use of carbon-intensive materials such as steel, brick and cement where these have been included in the design. The general waste reduction principles of 'reduce, reuse and recycle', with use of reclaimed or recycled materials where this is possible should also be apparent in the application.
2. Energy efficiency. The application addresses standards for energy efficiency, for example by specifying a high standard of insulation, with an estimated EPC level of C or above.
3. Renewable energy. Homes should be fitted with a source of renewable energy, such as solar thermal or heat pump heating, or photovoltaics. Applications or homes with fossil-fueled boilers should not be supported.
4. Accessibility. Sites allocated for new housing are, or are to be made, easily accessible by walking, cycling and public transport links to the town centre and local amenities including schools and sports facilities. Specifying in the application any locations for cycle storage is to be encouraged.
5. Green space. The application avoids loss of local nature sites and green spaces and includes plans for their maintenance where relevant (eg. tree watering). Significant developments should include areas that enhance local nature, through allowing habitats to establish, creating corridors between existing areas of habitat.
6. Tree coverage. Where the application includes a new open space, it includes sufficient new native tree coverage and other plantlife.
7. Low-carbon vehicles. The application supports low-carbon vehicles, for example, with EV charging points easily accessible.
8. Lighting. The application specifies where appropriate that LED lights are to be used.
9. Resilience to climate impacts. Building should not be built in flood plains nor otherwise contribute to significantly changing surface or sub-surface hydrology, including impacting on other homes and buildings. Buildings should be well-insulated and may contain features such as green roofs, that contribute passively to summer cooling.
10. Water saving. The application includes where appropriate water saving measures such as using water butts and toilet flushers that save water) and runoff water in concrete areas.

Applicants are encouraged to review the guidance in the Net Zero Carbon Toolkit (see section 8). The Net Zero Carbon Toolkit has been adopted and promoted as a guide by Babergh District Council [10].

Threshold

6.1 This Planning Advisory Committee may decide not to apply this guidance where it considers an application:

- to have low or zero environmental impact or carbon emissions, or
- to cover a site plot area less than 2000 sq. ft.



Retrofitting and Refurbishment in Existing Buildings, Listed and Traditional Buildings

7.1 Retrofitting carbon-reducing technology and materials into an existing building can be complex and difficult to achieve. Some adaptations may be inappropriate or prohibitively expensive, particularly for listed and traditional buildings. The Planning Advisory Committee may wish to make allowances in its deliberations, where evidence is provided that the adaptations have at least been considered.

Useful Sources of Information

8.1 The Net Zero Carbon Toolkit

<https://www.greensuffolk.org/app/uploads/2022/03/Net-Zero-Carbon-Toolkit-housing-in-Suffolk.pdf>

The Net Zero Toolkit is designed to assist in the planning, design and construction of a new build or retrofit housing project. It provides a technical, go-to guide on what to consider in the very early stages of design; how to achieve fabric energy efficiency; what systems to include; where to go for expert advice; and what to consider once you have finished your housing project and you are handing over to occupants.

The Net Zero Carbon Toolkit has sections covering both new builds and existing buildings.

8.2 What is Passivhaus?

https://www.passivhaustrust.org.uk/what_is_passivhaus.php

To achieve the Passivhaus Standard in the UK typically involves:

- accurate design modelling using the Passive House Planning Package (PHPP)
- very high levels of insulation
- extremely high-performance windows with insulated frames
- airtight building fabric
- 'thermal bridge free' construction
- a mechanical ventilation system with highly efficient heat recovery

8.3 Information for Existing, Traditional or Listed Buildings

Article: How to Insulate Old Homes

<https://www.homebuilding.co.uk/advice/how-to-insulate-old-homes>

LETI Retrofit Guide

<https://www.leti.london/retrofit>

Historic England articles

Modifying historic windows as part of retrofitting energy saving measures

<https://historicengland.org.uk/whats-new/features/climate-change/modifying-historic-windows-as-part-of-retrofitting-energy-saving-measures/>

Energy efficiency and historic buildings

<https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

Making changes to save energy

<https://historicengland.org.uk/advice/your-home/saving-energy/making-changes-to-save-energy/>



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Suffolk Preservation Society webinar: Net Zero – retrofit and refurbishment

<https://www.suffolksociety.org/net-zero-retrofit-and-refurbishment/>

References

- [1] The Suffolk Climate Change Partnership <https://www.greensuffolk.org/about/suffolk-climate-change-partnership/>
- [2] HM Government Net Zero Strategy: Build Back Greener, October 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf
- [3] United Nations Sustainable Development Goal 13: Climate Action:
<https://www.un.org/sustainabledevelopment/climate-change/>
- [4] Hadleigh Town Council Sustainability Policy (draft – not yet approved)
- [5] Hadleigh Town Council Climate Change Action plan (draft – not yet approved)
- [6] Suffolk County Council declaration of a Climate Emergency
<https://www.suffolk.gov.uk/planning-waste-and-environment/initiatives/our-climate-emergency-declaration/>
- [7] Babergh District Council Climate Change <https://www.babergh.gov.uk/environment/climate-change/>
- [8] National Planning Policy Framework <https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development>
- [9] UK Government guidance on climate change: <https://www.gov.uk/guidance/climate-change>
- [10] Suffolk Public Sector Leaders (Green Suffolk) statement on Net Zero Carbon Toolkit
<https://www.greensuffolk.org/net-zero-carbon-toolkit-housing/>