

# **THE CORE STRATEGY & OPTIONS**

## **BUILT AND NATURAL ENVIRONMENT**

### **Theme 4 - Protecting and enhancing the environment**

**To protect, improve and use our environment in a way that not only benefits the people who live, work and visit the area, but also leaves a rich and diverse legacy for future generations.**

## 2.8 ENVIRONMENT

### HEADLINE FACTS – THE ENVIRONMENT

- One-third of the district is designated an Area of Outstanding Natural Beauty  
Considerable parts of the district are of local, national and international importance for wildlife and biodiversity
- 50 kilometres of the district's 55 kilometres coastline, is designated as Heritage Coast.
- In the villages and built-up areas there are 33 Conservation Areas.
- The townscape of many of the towns and villages is of exceptional quality, not only due to their history and heritage but also their character and built form
- Across the district are 2706 Listed Buildings, 59 being Grade I and 164 Grade II\*.
- The district has a rich archaeological heritage, with 120 Scheduled Ancient Monuments, the most spectacular possibly being Sutton Hoo, the location of an Anglo Saxon Treasure.
- In geographic terms the majority of the district is rural in character but almost 60% of the population lives in the main towns or the urban fringe of Ipswich
- 16% of the agricultural land is grade 1 and 2 in quality. Significantly more is classified as grade 3
- Of the coastline:
  - 6.5 kilometres is defended by the Council against erosion;
  - 16 kilometres is defended by the Environment Agency against flooding;
  - 5.5 and 2 kilometres are defended by private frontages against erosion and flooding respectively;
  - 22 kilometres consists mainly of vulnerable soft cliffs or sand and shingle ridges.
- Within the district are 324 kilometres of designated main rivers (287 kilometres fluvial and 37 tidal);
- The main rivers are the Alde/Ore (including the Butley and Fromus), Blyth (including the Dunwich), Deben (including the Fynn and Lark), Minsmere, Orwell and Thorpeness Hundred;
- The decommissioning process for Sizewell A Magnox Nuclear Power Station began in late 2006 and is due last several years.
- The government is currently considering the potential of nuclear power to generate the nation's energy needs. This may have implications for the current Sizewell site

### The **Community Strategy** identifies as **KEY ISSUES**:

- To safeguard, enhance and manage the distinctive high quality of the environment of the district
- To undertake practical measures to improve public awareness, understanding of and promoting of recycling, energy conservation, water conservation, renewable energy and pollution control
- To improve the process of estuary and coastal management, integrating social, recreational, economic and environmental issues and actions
- Feeling safe/being safe from crime

### ***You have told us the issues are:***

- Maintaining high quality design.
- Recycling waste.
- Energy conservation, energy efficiency and renewable energy.
- Conservation of water resources.
- Coastline is subject to pressures, both human and natural.
- Flooding
- Air quality
- The impact of changes in agriculture on the economy

- The need for an over-arching objective relating to biodiversity and landscape
- There is a need for an over-arching objective relating to the protection of the countryside and coast.
- The value of the countryside to biodiversity enhancement to tourism

## **INTRODUCTION**

- 2.8.1 The acknowledged quality of the district's built and natural environments is one of its key assets, making it an attractive area to live and work, and for attracting tourists. Maintaining this quality is one of the Council's stated priorities. There is however a balance to be struck between maintaining and enhancing the quality of the environment, whilst recognising that the area will always be subject to change, not all of which change is covered by planning legislation. The role of the Core Strategy is therefore two-fold in this regard. Firstly it will provide advice and guidance in relation to those matters over which it has direct control through the planning legislation. Secondly it will look to provide appropriate support to other plans and strategies of statutory bodies such as the Environment Agency and the Forestry Commission where these impact on the local environment.
- 2.8.2 The role of the Core Strategy will be to support the national and international designations for both nature conservation and landscape interest. Changes to the boundaries of these areas is however beyond the remit of the Council so is not an issue for debate.
- 2.8.3 In relation to the built environment, the designation of conservation areas; scheduled ancient monuments and the listing of buildings are all issues that can be addressed outside of the local plan process. The role of the Core Strategy in relation to these topics will be to provide general advice supporting their retention and enhancement whilst minimising any significant adverse impacts upon them. These can be covered by general development control policies.
- 2.8.4 In respect of air pollution the Council has declared one Air Quality Management Area (AQMA) in Woodbridge and is currently working on an action plan to hopefully secure an improvement in the existing situation. Whilst there are no other Air Quality Management Areas identified, there is a potential conflict between siting new development close to the main road and rail networks. Care will need to be taken to ensure that the scale and location of new development does not create new problems that could result in additional AQMA's having to be declared. This may influence the location and mix of uses on potential development sites. It is an issue therefore best addressed at the site specific allocation level and no alternative options are identified in relation to the Core Strategy,
- 2.8.5 It is considered that other pollution issues such as those relating to noise, odour and light can be adequately dealt with under generic development control policies, or other legislation. The Core Strategy policies in relation to the siting and potential change of use of, existing employment sites is particularly relevant in this context.
- 2.8.6 There are however a number of issues which the Core Strategy can usefully address, and where alternative approaches to achieving stated objectives do present themselves.

## **ENVIRONMENTAL PROTECTION AND ENHANCEMENT**

### **Draft Objective 11 - Protecting and Enhancing the Environment**

To maintain and enhance the quality of the district's distinctive natural and built environments, by:

- The careful use of siting, design and impact of new development and limiting the scale of development to that appropriate to its location;
- Ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, helps to reduce waste and minimises the risk of pollution.
- Encouraging and promoting schemes which create renewable energy where consistent with the need to safeguard residential amenity, the environment and the landscape;
- Minimising the risk of flooding and ensuring appropriate management of land within flood plains
- Improving the process of estuary and coastal management, incorporating an integrating social, recreational, economic, physical and environmental issues and actions

## **QUALITY OF DESIGN**

### **Design Generally**

- 2.8.7 Most issues relating to quality of design, energy efficiency measures, use of re-cycled materials; local distinctiveness, etc will be addressed through the generic development control policies. This will include "designing out crime", which is particularly relevant given the priority accorded to safety by the Local Strategic Partnership and the Council itself.
- 2.8.8 An issue for the Core Strategy to address is to whether or not different levels of design should be acceptable in different areas across the district.
- 2.8.9 Option One – This option continues the approach set out in the adopted Local Plan, which essentially demands higher quality of design to be provided in specific areas such as the AONB and Special Landscape Areas and conservation areas. This option recognises that within some areas design issues will be of particular importance but could equally be used as an excuse to accept a poorer standard of development elsewhere. As such there is a danger that to continue with it as written would fail to maximise opportunities to enhance the quality of the district's environment, contrary to the Council's stated priority.
- 2.8.10 Option Two – This option proposes a high standard of design to be applied "across the board" within a generic design policy(s). Where additional advice is required in relation to a specific aspect of design, for example "massing", in relation to a particular area or site, this advice would be targeted by inclusion within the relevant site-specific policy. This policy approach is considered to better reflect the Council's aspirations for its area as set out in its Vision but could still be used to properly reflect very localised design issues.
- 2.8.11 In relation to either option, the design of new development will need to be considered in terms of both its aesthetics and the function it is required to perform.

### **Art**

- 2.8.12 Artists can play a significant role in shaping the district. From major new build and regeneration schemes, through village greens, play schemes, community halls and town

signage, to the small details of individual buildings artists can work with planners and communities to create distinctive, pleasing environments which respond to local need. Experience around the country suggests that best results are achieved when art and the involvement of an artist are included at an early stage in the project.

- 2.8.13 Option One – To continue as existing. No specific policy is included within the adopted Local Plan on the provision of public art. It is provided on an ad hoc basis. The problem with this type of approach is that art and the contribution it can make to a development scheme tends to be thought about at the last minute. In terms of developer contributions, it is often last on the list of requirements if it is thought about at all.
- 2.8.14 Option Two – Under this option specific reference is included within the plan either in its own right, or as part of the generic development control policies to the contribution art can and should be making to the development process.

<b>ENVIRONMENT</b>	
<b>Design</b>	
Q31	Which option do you prefer and why? Option 1 Option 2
Q32	Should the Council be actively promoting innovative new designs? YES/NO Why?
<b>Art</b>	
Q33	Is it appropriate for the Council to require the input of public art into development projects? YES/NO
Q34	If YES, what form might the public art take?

## **BIODIVERSITY**

<p><b>Draft Objective 12 - Biodiversity</b></p> <p><b>To maximise opportunities to enhance biodiversity by protecting and enhancing statutory and non-statutory protected sites, protected species and biodiversity action plan habitats and species, and contributing to regional targets through the restoration and creation of new priority habitats</b></p>
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- 2.8.15 Biodiversity means the variety of life forms, ecological roles they play and the genetic diversity they contain. Biodiversity is important in Suffolk Coastal because of the extent and range of sites and habitats in the District as set out below. These are of international/national importance (Special Protection Areas, SSSIs, Special Areas of Conservation and Ramsar) and also locally important habitats such as County Wildlife Sites or local nature reserves.

Table 5 Areas of Wildlife Importance

Site type	No. of sites
Wetland of International Importance (RAMSAR)	4 (7,917 ha)
Special Protection Area (SPA)	4 (7,917 ha)
Special Area of Conservation (SAC)	5 (3,755.4 ha)
Sites of Special Scientific Interest (SSSI)	45 (10,630 ha)
County Wildlife Sites (CWS)	206 (5,682 ha)
Local Nature Reserve (LNR)	.9 ha)

- 2.8.16 In 1992 the UK was one of 157 nations to sign up to the Convention on Biological Diversity. In 1994 the UK Biodiversity Action Plan was published confirming the Government's commitment to the principles and requirements of the Convention. The Government recognised that a national plan could only be implemented successfully if it was delivered at the local level. In Suffolk a working party was formed to prepare a Suffolk Biodiversity Action Plan. This includes all relevant habitats and species that are identified in the UK Action Plan along with a number of Suffolk 'character' species that had been identified during the process of public consultation.
- 2.8.17 The Council is duty bound to afford protection to areas designated for their wildlife interest, with the highest levels of protection going to those areas of international and national importance. The issue in relation to the Core Strategy will be to ensure that sufficient regard is had to these areas when identifying levels and scales of new development to be accommodated throughout the district. Whilst some of the broad locations identified for development are included at this level, it is more of an issue to be addressed at the Site Specific Allocation stage where development will be expected to be steered away from these areas.
- 2.8.18 Whilst these designated areas are provided with protection, the potential exists nonetheless for all new developments to look at ways of increasing or protecting biodiversity. It is proposed to continue the approach set out in the adopted local plan which will require proposals to:
- a) Ensure prudent use of natural resources.
  - b) Achieve reduced levels of energy consumption as a result of the actual development and its future occupancy.
  - c) Reduce the emission of greenhouse gases.
  - d) Minimise air, noise and light pollution.
  - e) Make provision for waste minimisation and recycling.
  - f) Utilise sustainable construction methods
  - g) Where relevant safeguard, enhance and manage the culture and heritage of the district
  - h) Protect, conserve and, where possible, enhance the varied landscape character within the district, reflecting landscape sensitivity and promoting local distinctiveness. Where development is justified proposals must include measures to enhance, restore or create special features of the landscape as appropriate

Opportunities for biodiversity to be further protected and enhanced will be assessed using a framework based on a network of:

- a) Designated sites (international, national, regional and local)
- b) Wildlife corridors
- c) The rivers, estuaries and coast
- d) Habitats and species identified in the Suffolk Biodiversity Action Plan

## **LANDSCAPE DESIGNATIONS**

### **Draft Objective 13 - Landscape**

**To identify opportunities to protect and enhance the various landscape character areas which exist within the district either through opportunities either linked to development or through other strategies.**

- 2.8.19 The district contains a variety of landscape types, all of which contribute to the quality of its environment. The coastal heaths and heritage coast areas are designated as being of national importance. As noted previously, to amend these boundaries is outside the Council's remit and there is no intention on the part of Natural England to change them. The district

does however contain other land that is designated at the county level as being important for its landscape value – the Special Landscape Area. Government guidance suggests that such locally designated areas should be deleted from local plans with policies being guided instead by advice set out in landscape character assessments. A landscape character assessment of the district is currently being undertaken as part of a wider countywide assessment.

- 2.8.20 Landscape character assessments recognise the merits of the landscape character types which have resulted from the differences in a range of features including field and settlement patterns, biodiversity, soils, cultural heritage and local building materials. The Council considers it important that these different character areas are conserved and enhanced, but that this must be integrated with the need to accommodate change in order to address social or economic objectives and meet the needs of communities. In doing so it will be necessary to ensure that not only is harm to the environment minimised but that opportunities are taken to bring about improvements wherever possible. This applies whether the initiative for change is brought about by land management decisions or new development.
- 2.8.21 Option One – Under this option, the SLA designation as set out in the adopted Local Plan would be deleted in the knowledge that work on a landscape character assessment was being undertaken. To adopt such an option runs the risk of these other locally important landscape areas being less protected by policy until such time as the landscape character assessment is adopted or agreed.
- 2.8.22 Option Two – Under this option, the SLA designation would be retained at least for the lifetime of the LDD, until its first review. The information and guidance contained in the landscape character assessment would be used to supplement the continuing landscape policies as and when it becomes available and has been adopted by the Council. Any decision that may be taken in the longer term to either delete or amend the SLA designation, would be based on the findings of the landscape character assessment and the success in implementing any guidelines generated by it. The success or otherwise of this approach would be monitored.

#### **ENVIRONMENT**

##### **Landscape designations**

Q35 Is sufficient consideration given to the landscape when determining development proposals? Y/N

Q36 If NO what suggestions do you have to address this?

#### **FLOOD RISK /COASTAL EROSION**

- 2.8.23 The District comprises gently undulating countryside intersected by a number of freshwater rivers such as the Deben, Alde and Ore, which have large flood plains. Much of the coastline is low lying, below sea level, protected by sea defences against tidal inundation.
- 2.8.24 Parts of the district are at therefore potentially at risk from both fluvial and tidal flood risk and from coastal erosion. Inevitably there are serious concerns about the impacts of coastal erosion and coastal flooding, both in respect of current properties at risk but also the long-term management of the area. These issues are therefore of considerable concern and are key factors in determining the scale and location of development. The implications arising from flood risk and coastal erosion are different to those of other environmental concerns, in that they can have a direct impact on human health and safety. It is therefore appropriate to raise them separately from other environmental concerns.

### **Draft Objective 14 - Flood Risk/Coastal Erosion**

**To recognise and accept that flood risk and coastal erosion will continue to impact to varying extents on different parts of the district.**

**To protect communities from flood risk or coastal erosion or, where that is not feasible, to have in place strategies for securing the long-term economic and social future of affected communities whilst addressing environmental objectives.**

### **Flood Risk**

2.8.25 The Environment Agency defines flood risk in terms of three Zones:

- Zone 1 has a low probability of flooding
- Zone 2 has a medium probability of flooding
- Zone 3a has a greater than 1 in 100 probability of river flooding in any one year or 1 in 200 of coastal flooding
- Zone 3b is the functional flood plain

2.8.26 In order to assist the process of determining where new development should be located, the Council has commissioned a Strategic Flood Risk Assessment to be undertaken. This information will not be available until early 2007, but the information it contains will be used to influence the final choice of development sites and the phasing of their development. Further advice in relation to individual sites the subject of an individual planning application, is already provided by the Environment Agency.

2.8.27 The issue for consideration at the Core Strategy level is the same as that highlighted above, i.e. do the broad scales and location of development take sufficient note of issues relating to flood risk? Is the information currently available, sufficiently robust to enable a realistic approach to assess future development opportunities in advance of the Strategic Flood Risk Assessment reporting?

2.8.28 The Council does not consider that waiting for the result of the strategic flood risk assessment is crucial to the development of the Core Strategy in that large parts of the district, including significant areas of land in and around the main settlements are not affected by flooding. It is considered that the information available to date is sufficiently robust to give a broad indication of what is likely or not likely to be acceptable at this level. No alternative option is therefore proposed in relation to the policy on settlement hierarchy. It is recognised however that the issue of flooding will be a factor when determining the site-specific options, and the possible phasing of individual sites through the Plan period.

### **Coastal Erosion**

2.8.29 The Suffolk coast is under threat from the sea and much is defended against erosion. Many of these defences demonstrate the risk of local instability. There is a Shoreline Management Plan in existence and this is being reviewed. This document is important as it identifies those coastal areas such as Dunwich where the coastline is expected to continue to erode.

2.8.30 Emerging from the Shoreline Management Plan review are likely to be areas where “managed realignment” is proposed. This is an approach whereby the natural processes of erosion and deposition are allowed to take place without the need for expensive engineering works. It brings benefits including the creation or recreation of inter-tidal habitats but may result in the loss of agricultural land and property. It can also have a major effect on current biodiversity. Equally, such re-alignment can result in the loss of valuable property and have a major impact on the economic and social infrastructure of communities. At its worst, it can result in the loss of complete communities.

2.8.31 The Core Strategy will need to take account of any proposals emerging from the review of the Shoreline Management Plan. It may be necessary to ensure that no permanent development is permitted in areas at risk from coastal erosion or inundation by the sea. Specific issues that the Plan might need to address include

- a) Requiring schemes to demonstrate that they have had regard to the Shoreline Management Plan;
- b) Providing appropriate levels of protection from erosion or flooding for the assets of the area; or
- c) Establishing the means by which the social, economic and environmental consequences of erosion/flooding are to be remedied.

<b>ENVIRONMENT</b>	
<b>Flood risk</b>	
Q37	To what extent do you consider flood risk to be a reason for rejecting development proposals? STRONGLY AGREE/ AGREE/ DISAGREE/STRONGLY DISAGREE
<b>Coastal erosion</b>	
Q38	To what extent do you consider risk from coastal erosion to be a reason for rejecting development proposals? STRONGLY AGREE/ AGREE/ DISAGREE/STRONGLY DISAGREE

### Renewable Energy

2.8.32 The government has estimated that around one third of the country's carbon emissions come from energy generation. It therefore advocates, through Planning Policy Statement 22, the encouragement of schemes that utilise renewable energy resources. This should be in tandem with energy efficiency measures, particularly in new development.

2.8.33 The Suffolk Coastal area can contribute towards the generation of renewable energy, most notably through biomass schemes and wind power. The former will generally be supported, subject to the consideration of proposals for associated buildings. In respect of wind power the environment is a sensitive one and needs protection. As the concept of renewable energy is promoted at national level the Option of resisting wind power generation entirely is not appropriate. Instead the Core Strategy must contain a policy which encourages the generation of renewable energy, most notably to serve local communities, but protects the environmental assets of the area. In devising policies it is suggested that the general principles as set out in Table 6 is an Option.

Table 6 Renewable Energy Schemes

*Large" consists of more than 2 turbines or a height greater than 15 metres*

Area	Large Scale Schemes	Small Scale Schemes
International designations for Wildlife	Not appropriate	Only where the original objectives of the designation are not compromised.
National designations for landscape, wildlife and heritage	Not appropriate	Only where the original objectives of the designation are not compromised.
Other Areas	Only where there is no material adverse impact on the environment and amenity. Cumulative impact will be taken into account.	Only where the impact on the environment and amenity is not significant or can be mitigated. Cumulative impact will be taken into account. Schemes that provide for local energy consumption, including new development, will generally be supported.

## ENVIRONMENT

### Renewable Energy Schemes

Q37 Table \* sets out the Council's thoughts on when and where new renewable energy schemes would be acceptable. Do you agree with this assessment YES/NO.

Q38 If NO please provide reasons and you own alternative suggestions

### Nuclear Energy

- 2.8.34 ssues and discussions relating to the role of nuclear energy in helping to meet the nations energy requirement are pertinent to Suffolk Coastal given the location of two nuclear power stations Sizewell A and Sizewell B within the district.
- 2.8.35 In its 2003 Energy White Paper the government recognised that new nuclear build might be necessary if the UK is to meet its carbon reduction targets, but it concluded that the economics made it unattractive at that time. A commitment was made that *“before any decision to proceed with the building of new nuclear stations there will need to be the fullest public consultation and the publication of a further White paper setting out the Governments proposals”*
- 2.8.36 More recently the government has considered the role of nuclear generation through the consultation document *“Our energy challenge: securing clean affordable energy for the long term”*. It concluded *“nuclear power is a source of low carbon generation which contributes to the diversity of our energy supplies. Under likely scenarios for gas and carbon prices new nuclear power stations should yield economic benefits in terms of carbon reduction and security of supply. The government believes that nuclear has a role to play in the future UK generating mix alongside other low carbon generating options.”*
- 2.8.37 Having reached that conclusion the government consulted during 2006 on how decisions on the location on any new nuclear build should take place. The government proposals are to provide a strategic context for new nuclear build and that the various regulators would assure safety, security and radiological issues of design proposals. The role of the planning process would be to consider the suitability of any specific proposal and the mitigation of local impacts only i.e. the planning inquiries into new nuclear installations will not be expected to focus on whether there is a need for nuclear power.
- 2.8.38 One of the reasons for proposing this national strategic context is that the government sees the planning process as a potential significant delay in bringing forward energy schemes. The Sizewell B Planning Inquiry for example, took over 6 years from the start of the Inquiry to the decision being made, with much of that time taken up considering national policy, design and safety issues.
- 2.8.39 It is anticipated that the government will issue a White Paper in 2007 setting out the proposed strategic criteria for identifying the most suitable sites and indicate how potential sites meet these criteria. This process would be open for public consultation and thus potential sites will be identified. It is likely that the government sees the development of new nuclear stations occurring during the next decade which is during the plan period of the current Local Development Framework. Importantly, the Nuclear Industry has indicated that the most viable sites for new build are likely to be adjacent to existing nuclear generating plan, although there might be other attractive sites, for example other nuclear installations and sites with retiring fossil fuel generating stations.
- 2.8.40 Sizewell will undoubtedly be a site that will be considered as part of the national strategic assessment. It is located within the AONB and within the Heritage Coast in a sensitive

landscape. It is also close to sites identified as being of international importance for their wildlife interest. The protection of these areas is promoted through PPS7 “Sustainable Development in Rural Areas” which states “Major developments should not take place in these designated areas, except in exceptional circumstances.” The exceptional circumstances would include the requirement to demonstrate an overriding need for a development and that all other potential options have been properly discounted.

- 2.8.41 If an application for a new nuclear station were to be made, it would be submitted to the Secretary of State at the Department for Trade and Industry under the Electricity Act. Suffolk Coastal District Council would be a statutory consultee. There would need to be an assessment of the likely potential local impacts and their possible mitigation. The question needs to be asked whether the LDF should set out a policy framework for considering the local issues and how these issues should be assessed, especially as if a proposal comes forward, it will be within the timescale of the document.
- 2.8.42 Consideration also needs to be given to the fact that development of a new nuclear station may be undertaken at the same time as the decommissioning of the Sizewell A station. Sizewell B is currently proposed to generate electricity until 2035.
- 2.8.43 Set out below is the range of local/siting issues that the Council considers should be taken into account when looking at the impact of a new power station.

Potential Impacts to be Considered and Mitigation measures to be included-

- a) Proposed layout and design
- b) Grid connection / power line changes?
- c) Landscape/visual character assessment including cumulative effects
- d) Coastal erosion/coast protection issues
- e) Ecological impacts (on nearby designated sites)
- f) Construction management- sustainable procurement policy
- g) Transport issues- routing of vehicles during construction?- upgrade of roads? – use of rail and sea for access?
- h) Social issues – local community issues during long construction period- housing of workers in the local area
- i) Economic impacts upon the area during and after construction
- j) Site decommissioning
- k) On site storage of nuclear waste?

**ENVIRONMENT**  
**Nuclear Power**

Q39 Are there any other issues that you think should be taken into account when considering the impacts of a potential new nuclear station upon the local area?  
YES/NO

Q40 If YES what are they?

**Renewable Energy and Energy Efficiency in New developments**

- 2.8.44 The UK is committed to reducing CO<sub>2</sub> emissions and has set stringent targets of reducing CO<sub>2</sub> in the UK by 20% by 2010 and that by 2010, 10% of electricity is to be from renewable sources with 20% by 2020.
- 2.8.45 Suffolk Coastal District Council also signed the Nottingham Declaration on Climate Change in October 2006. As a signatory the District Council is committed to complying with the Kyoto Protocol (an international treaty signed in 1997 which included a binding commitment to reduce CO<sub>2</sub> emissions) and producing its own climate change strategy for reducing CO<sub>2</sub> and other green house gas emission.

- 2.8.46 The Options report at 2.9.33-2.9.34 currently deals only with large-scale renewable schemes and the issues to be considered but the document does not currently have options that should be considered for the reduction of CO<sub>2</sub> emissions and energy efficiency when considering all development proposals.
- 2.8.47 The Report of the Panel into the RSS has advocated pulling back from the level of detail on this issue to be included in LDF's as it was felt that it possibly cuts across other legislative requirements (such as the Building Regulations). However a statement by the Governments Planning Minister in July 2006 (therefore after the Panel Report) states “ *In particular the government expect all planning authorities to include policies in their development plan that require a percentage of the energy in new developments to come from on-site renewables where it is viable*”
- 2.8.48 New national planning guidance on Climate Change is expected shortly to which the new LDF will be expected to comply. In advance of that final guidance being published, the Council wishes to hear the views of consultees on requiring such a policy as an approach having regard to the wider issues on climate change (and the Council's signing of the Nottingham Declaration).
- 2.8.49 In considering this issue regard has to be had to the potential of the growth options in the Options report and the potential contribution such a policy provision could have, in addressing climate change at the local level. The Building Regulations are becoming more stringent on energy conservation over time so encouraging energy conservation above the current minimum requirements at the time of a potential planning application is considered appropriate.
- 2.8.50 If the Option of requiring renewables and energy efficiency measures is to be included and considered as part of a planning application, then the level of requirement has to be considered. Set against this, there is a need to consider the financial viability of schemes and its impact upon the character of our district with its countryside, Conservation Areas and the more dense suburban settlements. In response to the first of these points it is generally accepted that the costs of providing small-scale renewables and other energy efficient means would have an increased cost factor but that this is diminishing all the time as the costs of production reduce. The visual impact of these types of renewable energy schemes are rightly of concern but it is proposed these would be addressed through appropriate design policies but also through the provision of new Supplementary Planning Documents.
- 2.8.51 It is accepted that for this to be properly considered a new SPD will need to be explicit in how this is to be taken forward as a positive tool for development control purposes.

**ENVIRONMENT**

**Renewable energy / energy efficiency**

- Q43 As a matter of principle, should the requirement to provide a proportion of a scheme's energy to come from renewable sources apply to all forms of developments YES/NO
- Q44 If NO which types of development do you consider should be excluded and why?
- Q45 As a matter of principle, should the Council require all forms of development to maximise as far as practicable the use of energy efficiency measures? Y/N
- Q46 If YES how do you suggest this might be achieved?