



FEBRUARY  
2025

# Sustainability & Energy Statement

Land east of Lunce's Hill, Haywards Heath

Iceni Projects Limited on behalf of  
Catesby Strategic Land Limited  
and Rurban Estates Limited

ICENI PROJECTS LIMITED  
ON BEHALF OF CATESBY  
STRATEGIC LAND LIMITED  
AND RURBAN ESTATES  
LIMITED

February 2025

## Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

Edinburgh: 14 – 18 Hill Street, Edinburgh, EH2 3JZ

Glasgow: 201 West George Street, Glasgow, G2 2LW

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Manchester: WeWork, Dalton Place, 29 John Dalton Street, Manchester, M2 6FW

Sustainability & Energy Statement  
LAND EAST OF LUNCE' S HILL, HAYWARDS HEATH

t: 020 3640 8508 | w: [iceniprojects.com](http://iceniprojects.com) | e: [mail@iceniprojects.com](mailto:mail@iceniprojects.com)

linkedin: [linkedin.com/company/iceni-projects/](https://www.linkedin.com/company/iceni-projects/) | twitter: @iceniprojects

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## 1. EXECUTIVE SUMMARY

- 1.1 Iceni Projects Ltd has been commissioned by Catesby Strategic Land Limited and Rurban Estates Limited to produce a Sustainability & Energy Statement to accompany the outline planning application for the proposed development of the Land east of Lunce's Hill, Haywards Heath.
- 1.2 This outline planning application proposes the provision of up to 130 dwellings, together with the change of use of an existing barn into a flexible community and/or commercial use, together with the provision of outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works.
- 1.3 The proposed development spans the boundary between two counties, with part of the site lying within the administrative boundary of Lewes District Council, East Sussex; and the remainder of the site lying within the administrative boundary of Mid Sussex District Council, West Sussex.
- 1.4 Sustainability is a core consideration of the application and has been incorporated from the project outset. Energy and water efficiency have been maximised, whilst the production of waste and pollution is to be minimised, thus ensuring the impact of the proposals on its immediate surroundings and the environment as a whole is minimised.
- 1.5 Consideration has been given to Chapter 14 of the National Planning Policy Framework (NPPF), the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, the Lewes District Council Renewable Energy and Energy Efficiency Supplementary Planning Document, the Lewes District Council Planning Technical Advice Note: Sustainability in Development, the Lewes District Council Planning Technical Advice Note: Circular Economy, the Wivelsfield Parish Neighbourhood Plan 2015 – 2030, the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation), the Mid Sussex District Plan 2014 – 2031, the Mid Sussex Design Guide Supplementary Planning Document, the Haywards Heath Town Council Neighbourhood Plan 2014 – 2031, and the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications) in the overall formulation of this strategy, with two key elements proposed for the approach to the scheme's sustainability proposals, as follow:
  - The overall development has been assessed using the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, the Lewes District Council Renewable Energy and Energy Efficiency Supplementary Planning Document, the Lewes District Council Planning Technical Advice Note: Sustainability in Development, the Lewes District Council Planning Technical Advice Note: Circular Economy, the Wivelsfield Parish Neighbourhood Plan 2015 – 2030, the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions

(Regulation 18 Consultation), the Mid Sussex District Plan 2014 – 2031, the Mid Sussex Design Guide Supplementary Planning Document, the Haywards Heath Town Council Neighbourhood Plan 2014 – 2031, and the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications), to demonstrate that the proposed buildings will maximise resource efficiency, minimise the generation of waste and pollution, and ensure the risk of flooding on-site is mitigated during both construction and in operation, to provide dwellings that meet the recommended standards for well-being of future occupants; and

- The carbon dioxide (CO<sub>2</sub>) emissions reduction strategy for the proposals is based on the energy hierarchy to provide a rigorous methodology, which aims to reduce the carbon dioxide emissions from the development as far as possible. This is intended to be achieved through the employment of highly efficient building fabric components to reduce energy demand, and the potential inclusion of renewable and low carbon energy technologies to deliver further carbon dioxide emissions reductions. It is anticipated that the proposed carbon dioxide emissions reduction strategy will facilitate significant carbon dioxide emissions savings compared to the Part L:2021 baseline, aiming to significantly exceed the current requirements of Lewes and Mid Sussex District Councils and to align with the direction of the preferred policy options set out within the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation) and draft policies set out in the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications).

1.6 The proposed strategy has been based around the Presumption in Favour of Sustainable Development and Core Policies 7, 8, 9, 11 and 14 of the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, Policies DM14 and DM20 of the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, Strategic Policies CC1, CC2, CC3 and CC4 of the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation), Strategic Objectives 1 and 6 and Policies DP39 and DP42 of the Mid Sussex District Plan 2014 – 2031 and the Strategic Objectives and Policies DPS1, DPS2, DPS5, and DPS6 of the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications). In summary, based on this strategy, the proposed development will;

- make efficient use of land;
- promote the use of sustainable and active modes of transport;
- reduce the risk of flooding on-site and in the surrounding area;
- minimise internal water consumption to 105 litres per person per day;
- incorporate low-impact materials, according to the BRE Green Guide to Specification;
- minimise waste production during construction and maximise the proportion of waste to be diverted from landfill;

- mitigate the risk of overheating;
- incorporate measures to improve site biodiversity, including biodiverse planting;
- ensure air, noise, ground, light and water pollution are minimised as far as possible;
- minimise energy demand through the specification of low U-values, low air permeability and low thermal bridging to reduce heat loss;
- be fossil fuel free, utilising electric-only systems, such as air source heat pumps (ASHPs) to serve the space and water heating demands of the proposed buildings;
- utilise renewable technology, such as rooftop photovoltaic panels, to provide renewable electricity; and
- achieve a significant reduction in CO<sub>2</sub> emissions for the proposed buildings, following the Energy Hierarchy methodology.

1.7 Overall, the proposals constitute sustainable development in accordance with national and local policy requirements and will provide a development that seeks to promote these principles in operation.

## 2. INTRODUCTION

2.1 Iceni Projects Ltd was commissioned by Catesby Strategic Land Limited and Rurban Estates Limited to produce a Sustainability & Energy Statement to accompany the outline planning application for the proposed residential development of the Land east of Lunce's Hill, Haywards Heath.

### Report Objective

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2.2 This document details the sustainable design and construction measures adopted by the proposed development and gives an overview of the design proposals that will ensure the development operates in a sustainable manner over the lifespan of the scheme. The Sustainability & Energy Statement report headlines will provide a framework for the project team to operate consistently within sustainability guidelines set out by Lewes and Mid Sussex District Councils.

2.3 The report is structured to meet these guidelines as follows:

- Section 3 discusses the planning context and policies which are relevant to sustainability;
- Section 4 discusses the development response to the policy drivers for sustainability;
- Section 5 sets out the development's energy strategy to minimise CO<sub>2</sub> emissions; and
- Section 6 summarises the development's design response.

### Site and Surroundings

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2.4 The application site (Appendix A1) is located to the east of Lunce's Hill, at the southern edge of the town of Haywards Heath, West Sussex. The site is bound by properties facing onto Lunce's Hill and Hurstwood Land to the west and northwest, small agricultural fields and Colwell Lane to the north, an area of woodland, known as Hurst Wood, to the east, and open agricultural fields to the south.

2.5 The application site itself currently comprises several agricultural fields. The Pellingford Brook runs through the centre of the site, and a number of existing hedgerows and individual trees divide the fields contained within the site boundaries. The surrounding area is predominantly residential to the north and northwest, with the site located at the southern edge of Haywards Heath. The surrounding area to the south and east is predominantly rural in nature, with a number of villages, including Scaynes Hill and Wivelsfield Green, located to the east and southeast. The town of Burgess Hill is located to the southwest of the site.

## The Proposed Development

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2.6 The description of development is as follows:

*“Outline planning application for the erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access).”*

2.7 The illustrative masterplan is shown in Figure 2.1 below, whilst the red line boundary of the site is displayed in Appendix A1.

**Figure 2.1 Illustrative Masterplan**



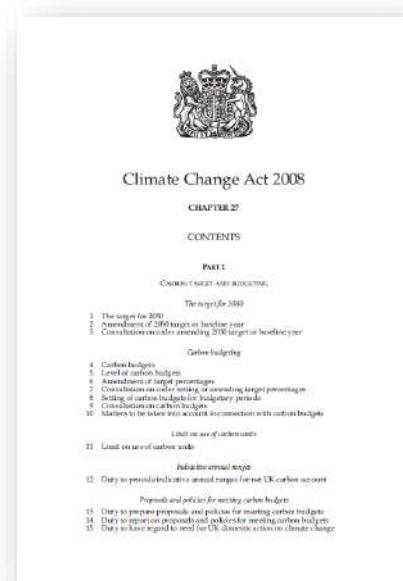
### 3. PLANNING POLICY FRAMEWORK

3.1 Built environment sustainability is incorporated within policy and regulation at a national and local level, as set out below.

#### National

##### Climate Change Act 2008 (November 2008)

3.2 On 26<sup>th</sup> November 2008, the UK Government published the Climate Change Act 2008; the world's first long-term legally binding framework to mitigate against climate change. Within this framework, the Act sets legally binding targets to increase greenhouse gas emission reductions through action in the UK and abroad from the 60% target set out in the Energy White Paper, to 80% by 2050.

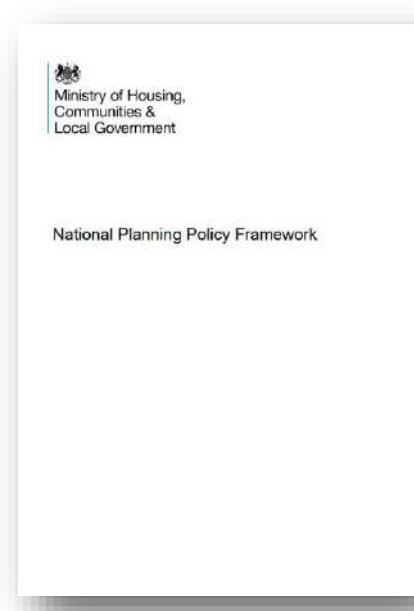


3.3 As required under Section 34 of the Climate Change Act, the Sixth Annual Carbon Budget was accepted by the Government in April 2021. This sets out a budget for UK emissions for the period 2033 – 2037.

3.4 Following a commitment in June 2019, the Climate Change Act has been amended to target net zero carbon emissions by 2050.

##### National Planning Policy Framework (December 2024)

3.5 The Ministry of Housing, Communities & Local Government determines national policies on different aspects of planning and the rules that govern the operation of the system. Accordingly, the National Planning Policy Framework (NPPF), which came into force in March 2012 and was updated in February 2019, aims to strengthen local decision making. Additional updates have since been made through the latter half of 2020 and in January and July 2021 to reflect changes related to use classes, permitted development rights, the calculation of housing need, and requirements to achieve beauty alongside sustainability. Further updates were made in September and December 2023 with respect to



onshore wind development, and beauty, design, infrastructure, neighbourhood and the environment, respectively. In December 2024, the NPPF was revised in response to reforms to the Framework, and consultations on other changes to the planning system. In December 2024, the NPPF was revised in response to reforms to the Framework, and consultations on other changes to the planning system.

3.6 Paragraphs 10 and 11 of the NPPF confirm that at the heart of this document is a “*presumption in favour of sustainable development*”, and that development proposals that accord with an up-to-date development plan should be approved without delay.

3.7 Paragraph 7 states that 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.

3.8 Achieving sustainable development means that the planning system has three overarching activities, which are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives:

- **An Economic Role** – ensuring the provision of land and infrastructure needed to help build a *strong, responsive and competitive economy*.
- **A Social Role** – supplying the required amount of housing while at the same time ensuring and building *strong, vibrant and healthy communities*. Ensuring that the built environment is sited around accessible local services which help support a community’s *health, social and cultural well-being*.
- **An Environmental Role** – ensuring development contributes to the protection and enhancement of the *natural, built and historic environment* through the improvement of biodiversity, minimising the use of natural resources and production of pollution / waste, and guaranteeing sufficient adaptation to climate change.

### Future Homes Standard (March 2019)

3.9 Within the Spring Statement 2019, the Chancellor announced the future introduction of the Future Homes Standard 2025. The Standard will mandate the end of fossil fuel heating systems in new homes from 2025 and target “world-leading levels of energy efficiency”. In doing this, the Standard aims to utilise green technology to reduce environmental impacts, as well as reducing consumer energy bills.

3.10 This Standard is expected to build on the Prime Minister’s Clean Growth Grand Challenge mission, which aims to at least halve the energy usage of new build properties by 2030. It also looks to halve the costs of renovating existing buildings to achieve a similar standard of energy efficiency as new buildings, whilst improving their quality and safety.

### Future Buildings Standard (January 2021)

3.11 On 19<sup>th</sup> January 2021, the government announced the future introduction of the Future Buildings Standard. The Standard will deliver new non-domestic buildings that are zero-carbon ready from 2025 onward, which use low-carbon heat, and which have the best fabric standards possible. As the electricity grid continues to decarbonise, homes built to the Standard will become net zero carbon over time, with no need for further energy efficiency retrofit work as they will not rely on fossil fuels for heating and hot water.

3.12 This Standard is expected to build on the Prime Minister’s Clean Growth Grand Challenge mission, which aims to at least halve the energy usage of new buildings by 2030. It also looks to halve the costs of renovating existing buildings to achieve a similar standard of energy efficiency as new buildings, whilst improving their quality and safety.



#### The Future Homes Standard

2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings



**The Future Buildings Standard: 2021**  
Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for non-domestic buildings and dwellings; and overheating in new residential buildings  
Summary of responses received and Government response

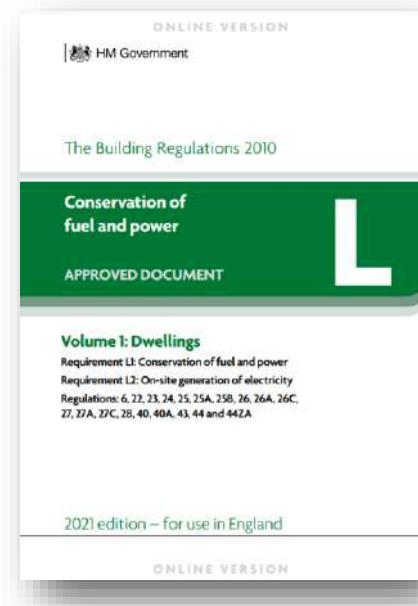
December 2021  
Department for Levelling Up, Housing & Communities

### Part L:2021 of the Building Regulations (June 2022)

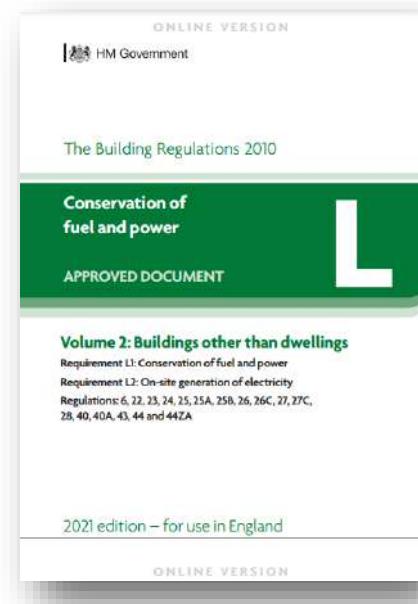
3.13 Part L of the Building Regulations relates to the conservation of fuel and power, and applies to both new and existing buildings. The current edition covers the energy efficiency requirements of the building regulations as set out in Part L of Schedule 1 to the Building Regulations. Technical guidance is contained in two Part L Approved Documents.

3.14 The documents of relevance to this scheme include:

- **Approved Document L Volume 1: Dwellings.** This provides the methodology for new build, domestic buildings to meet current energy efficiency standards, including backstop U-values, carbon dioxide emissions calculations and minimising the risk of overheating. Carbon dioxide emissions reductions are prescribed for 'regulated' emissions only, and relate to heating, hot water, lighting, auxiliary and cooling (where specified). Emissions from domestic appliances (cooking, for example) are considered to be unregulated emissions, and are excluded from the analysis.



- **Approved Document L Volume 2: Buildings other than dwellings.** This provides the methodology for new build, non-domestic buildings to meet current energy efficiency standards, including backstop U-values, carbon dioxide emissions calculations and minimising the risk of overheating. Carbon dioxide emissions reductions are prescribed for 'regulated' emissions only, and relate to heating, hot water, lighting, auxiliary and cooling (where specified). Emissions from other equipment (computers, for example) are considered to be unregulated emissions, and are excluded from the analysis.



## Local

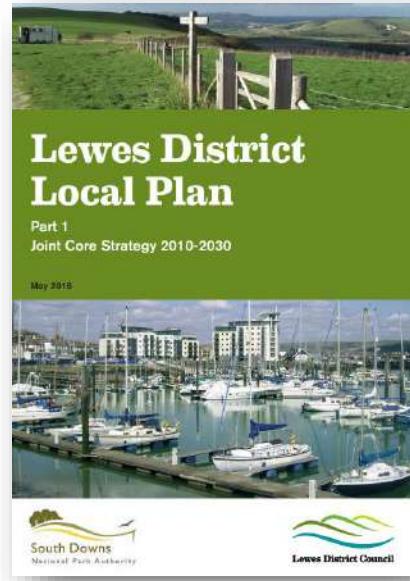
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3.15 The prosed development site falls partially within the demise of Lewes District Council, and partially within the demise of Mid Sussex District Council, with polices set out by both Councils therefore applicable to the proposed development. In determining the local context, therefore, the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030 (May 2016), the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies (February 2020) and the Mid Sussex District Plan 2014 – 2031 (March 2018) set out policy relevant to sustainability.

### Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030 (May 2016)

3.16 The Core Strategy sets out the over-arching strategy and associated strategic policies for determining growth and change in the District over the period 2010 – 2030. The following policies are considered of great relevance to this proposal:

- **Presumption in Favour of Sustainable Development** states that, when considering development proposals, the local planning authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.



Planning applications that accord with the policies in the Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the local planning authority will grant permission unless material considerations indicate otherwise – taking into account whether:

1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
2. Specific policies in that Framework indicate that development should be restricted.

- **Core Policy 7: Infrastructure** states that the creation of sustainable communities in the district where residents enjoy a high quality of life will be achieved by:

1. Protecting, retaining and enhancing existing community facilities and services, including facilities which serve older people. New community facilities should be located within the defined planning boundaries where they will be most accessible. In exceptional circumstances, such facilities may be located outside of these areas where it can be demonstrated that this is the only practicable option and the site is well related to an existing settlement.
2. Resisting proposals involving the loss of sites or premises currently, or last, used for the provision of community facilities or services unless:
  - i. a viability appraisal, including a marketing exercise where appropriate, demonstrates that continued use as a community facility or service is no longer feasible; or
  - ii. an alternative facility of equivalent or better quality to meet community needs is available or will be provided in an accessible location within the same locality; or
  - iii. a significant enhancement to the nature and quality of an existing facility will result from the redevelopment of part of the site or premises for alternative uses.
3. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan that will set out how necessary physical and social infrastructure provision for the district will be achieved with key delivery partners in a timely manner to support growth.
4. Ensuring that land is only released for development where there is sufficient capacity in the existing local infrastructure to meet the additional requirements arising from the proposed development. Where development would create the need to provide additional or improved community facilities, services or infrastructure, a programme of delivery will be agreed with the relevant infrastructure providers to ensure that these improvements are provided at the time they are needed.

- **Core Policy 8: Green Infrastructure** states that the local planning authority will promote a connected network of multifunctional green infrastructure by protecting and enhancing the quantity, quality and accessibility of open spaces throughout the district. This will be achieved by:
  1. Identifying in the Site Allocations and Development Management Policies DPD or SDNPA Local Plan areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space.
  2. Ensuring that development maintains and/or manages identified green infrastructure, where appropriate.

- 3. Requiring development to contribute to the green infrastructure network and make provision for new green infrastructure and/or linkages to existing green infrastructure, where appropriate.
- 4. Resisting development that would undermine the functional integrity of the green infrastructure network or would result in the loss of existing green spaces, unless either mitigation measures are incorporated within the development or alternative and suitable provision is made elsewhere in the locality.
- 5. Working in partnership with other organisations to increase walking, cycling and public transport access to the countryside.
- **Core Policy 9: Air Quality** states that the local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area (AQMA) designations. Applications for development that by virtue of their location, nature or scale could impact on an AQMA will be required to:

1. Have regard to any relevant Air Quality Action Plans (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP.
2. Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

All applications for development will be required to:

- 3. Provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.
- 4. Ensure that the development will not have a negative impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.
- 5. Promote opportunities for walking, cycling and public transport and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations, and promote the opportunity for cycling through the provision of cycleways.
- 6. Secure best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.
- **Core Policy 11: Built and Historic Environment and High Quality Design** states that the local planning authority will seek to secure high quality design in all new development in order to assist in creating sustainable places and communities. This will be achieved by ensuring that the design of development:

- i. Respects and, where appropriate, positively contributes to the character and distinctiveness of the district's unique built and natural heritage;
  - ii. Within the South Downs National Park is in accordance with the National Park purposes and outside the SDNP has regard to the setting of the National Park and its purposes; Adequately addresses the need to reduce resource and energy consumption;
  - iii. Responds sympathetically to the site and its local context and is well-integrated in terms of access and functionality with the surrounding area;
  - iv. Is adaptable, safe and accessible to all and, in relation to housing development, is capable of adapting to changing lifestyles and needs;
  - v. Incorporates measures to reduce opportunities for crime or anti-social behaviour, including the provision of active ground floor frontages in town, district and local centres to assist with the informal surveillance of the public realm;
  - vi. Makes efficient and effective use of land, avoiding the creation of public space which has no identified use or function;
  - vii. Provides a satisfactory environment for existing and future occupants including, in relation to housing development, adequate provision for daylight, sunlight, privacy, private outdoor space and/or communal amenity areas; and
  - viii. Minimises flood risk in accordance with Core Policy 12.
- **Core Policy 14: Renewable and Low Carbon Energy and Sustainable Use of Resources** states that, in order to reduce locally contributing causes of climate change, including through the implementation of sustainable construction techniques in new developments, the local planning authority will:
  1. Encourage renewable and low carbon energy in all development, with proposals responding to the potential identified in the Energy Opportunities Map. Development location and design that takes advantage of opportunities for decentralised, renewable and low carbon energy will be encouraged.
  2. Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed:
    - i. Appropriate contribution to meeting national and local renewable heat and energy targets;

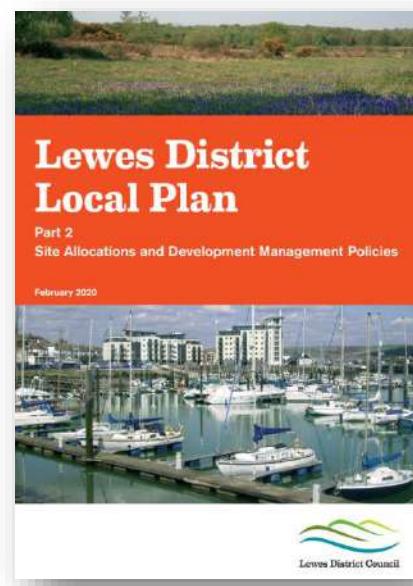
- ii. Protecting the special qualities and setting of the South Downs National Park, in accordance with national park purposes and the duties of regard by relevant authorities;
- iii. Landscape and visual impact;
- iv. Local amenity impact;
- v. Ecology impact; and
- vi. Cultural heritage impact, including the need to preserve and enhance heritage assets.

3. Require planning applications relating to Core Strategy strategic site allocations to be accompanied by an Energy Strategy. The Energy Strategy will seek to incorporate decentralised and renewable or low carbon technologies into the development proposal. Where a strategic site is developed in phases, the Energy Strategy will guide the development of infrastructure for renewable and/or low carbon technologies in a coordinated way.
4. Require all new dwellings to achieve water consumption of no more than 110 litres per person per day, unless it can be demonstrated that it would not be technically feasible or financially viable. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard and developers will be expected to provide certification evidence of the levels achieved in the relevant requirements/standards at the planning application stage.

**Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies (February 2020)**

3.17 Part 2 of the Local Plan supports and seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1, with the following policies of relevance:

- **Policy DM14: Multi-functional Green Infrastructure** states that development will be permitted where opportunities for the provision of additional green infrastructure have been fully considered and would be provided where justified by the character of the area or the need for outdoor playing space. Green infrastructure provided as part of new development should incorporate features to encourage biodiversity and retain or, where possible, enhance existing features of nature conservation value within the site. Existing ecological networks should be identified and



ecological corridors should, where practical and appropriate, form an essential component of green infrastructure provision to ensure habitat connectivity.

- **Policy DM20: Pollution Management** states that development that may potentially contribute to, or be adversely affected by, unacceptable levels of soil, air, water, noise or light pollution will only be permitted where it can be demonstrated that:
  1. its location is appropriate in terms of land use in relation to the uses in the surrounding area;
  2. the development will not have an unacceptable impact on health, the natural environment or general amenity;
  3. the development will not have an adverse impact on the use of other land;
  4. where relevant, the appropriate after-use of land can be secured.
- **Policy DM25: Design** states that development which contributes towards local character and distinctiveness through high quality design will be permitted where the following criteria are met:
  1. its siting, layout, density, orientation and landscape treatment respond sympathetically to the characteristics of the development site, its relationship with its immediate surroundings and, where appropriate, views into, over or out of the site;
  2. its scale, form, height, massing, and proportions are compatible with existing buildings, building lines, roofscapes and skylines;
  3. it incorporates high quality, durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the character of the area;
  4. existing individual trees or tree groups that contribute positively to the area are retained;
  5. adequate consideration has been given to the spaces between and around buildings to ensure that they are appropriate to their function, character, capacity and local climatic conditions;
  6. any car parking or other servicing areas are appropriate to the context and sensitively located and designed so as not to dominate the public realm;
  7. there will be no unacceptable adverse impact on the amenities of neighbouring properties in terms of privacy, outlook, daylight, sunlight, noise, odour, light intrusion, or activity levels;
  8. major developments will promote permeable, accessible and easily understandable places by creating spaces that connect with each other, are easy to move through and have recognisable landmark features;

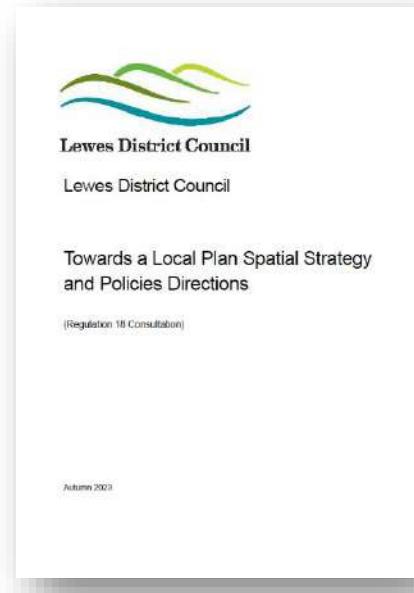
9. residential developments of 10 or more dwellings should demonstrate how the 'Building for Life 12' criteria have been taken into account and would be delivered by the development.

Development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions will not be permitted:

**Lewes District Council Towards a Local Plan Spatial Strategy and Policies Directions (Regulation 18 Consultation; Autumn 2023)**

3.18 The 'Towards a Local Plan spatial strategy and policies directions' document makes a key stage in the plan making process and provides the basis for consultation with residents, businesses and organisations on how we should develop the plan area for the future. The document outlines the preferred vision, aims and key planning issues affecting the plan area, as well as proposed policy directions for addressing these. Strategic policy options of relevance include:

- **Strategic Policy CC1: Mitigating and Adapting to Climate Change** will set out the overall approach to mitigating and adapting to climate change. This policy will ensure that development in the plan area will represent sustainable development, and include the following principles:
  - Ensure that new development is as energy efficient and low carbon as possible.
  - Encourage the retrofit of existing buildings to reduce carbon emissions.
  - Ensure new development is designed to address the risks associated with climate change.
  - Support suitable opportunities for low carbon energy generation and storage to serve the district.
  - Reducing the reliance on private vehicles and the emissions associated with transport and prioritising walking and cycling measures.
  - Improve infrastructure to support sustainable development and help existing residents to reduce emissions.
  - Work with the natural environment to help reduce emissions and risks associated with climate adaptation alongside other benefits such as nature restoration and improving biodiversity.



- **Policy CC2: A Design Reports to a Changing Climate** will require all new developments to follow a clear energy hierarchy when developing an energy strategy which should be documented in an Energy Statement. The Energy Statement will need to set out how the development will:
  - Reduce energy demands
  - Use energy efficiently
  - Generate and store renewable energy
  - Monitor energy use.

The policy will be clear that gas boilers or other fossil fuel heating systems should only be used where it proven by the developer that other options are not technically feasible or financially viable. The plan will also set out that strategic allocations should consider the incorporation of heat networks.

Submitted Energy Statements should set out how the development meets the following requirements, details of which will be set out in further policies or additional guidance:

- How developments will reduce energy demands and where practical and viable meet a maximum space heating demand of 30kWh/sqm/yr.
- Require all development to install heating systems that align with carbon neutral policy, and which are designed to maximise efficiency.
- Set requirements for assessing overheating risks and mitigating these through design, avoiding the use of active cooling systems unless essential.

New local plan policy will require applications to be accompanied by a risk assessment showing the overheating risks which have been identified and the measures taken to address these in the proposal while avoiding the use of active cooling systems wherever possible.

- **Policy CC3: Solar PV, Storage and Demand Management** will require all developments to incorporate PV and have a presumption to maximise the amount of PV installed, unless it is shown this is not technically feasible or financially viable.

All developments should consider the potential for thermal and battery storage as well as smart metering and other demand management systems. The use of these systems will provide long term benefit for the building owners in both energy costs and resilience as well as providing wider benefits to the local power networks. Options relevant to the development should be considered in the Energy Statement:

- **Policy CC4: Sustainable Construction** will set out requirements for development proposals to provide evidence of circular economy principles and demonstrate how waste arising from construction is to be minimised. This will include consideration of the longevity, maintenance, and repair of developments and how they can be adapted to changing needs through the development lifetime. The policy will also set out the priority for use of locally sourced and/or sustainable materials that have smaller carbon footprints.

A policy requiring whole life cycle carbon assessment is being considered for larger developments. In these circumstances the developer would be required to document the whole life carbon assessment and the steps taken to minimise/mitigate these through the design of the development within the Energy Statement. There would be a cost to carrying out such assessments which would need to be assessed by the whole plan viability assessment

Lewes District Council Renewable Energy and Energy Efficiency Supplementary Planning Document (February 2006)

3.19 The Sustainable Design and Construction Supplementary Planning Document (SPD) aims to inform developers of what is expected within the District in terms of sustainable design.

3.20 The SPD document highlights the importance of energy efficiency as opposed to any low carbon or renewable energy systems. Some renewable energy and low carbon systems are then introduced, along with particular considerations for the District.

**Renewable Energy & Energy Efficiency**

Planning guide for householders and small businesses

Lewes District Council

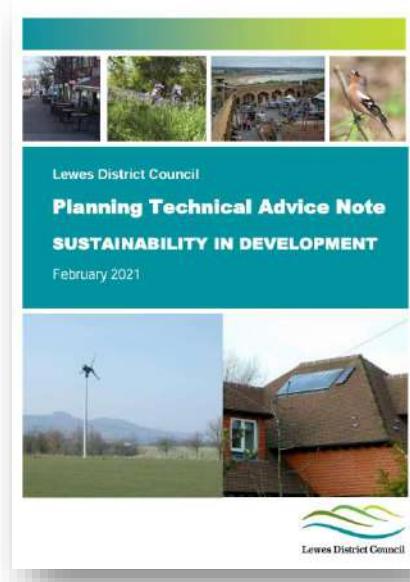
### Lewes District Council Planning Technical Advice

#### Note: Sustainability in Development (February 2021)

3.21 The Technical Advice Note (TAN): Sustainability in Development seeks to draw together the different aspects of development which can influence how sustainable it is, in order to make it easier to consider these factors in both the design and construction phases and ensure that low carbon development outlined in National Guidelines becomes a reality.

3.22 A Sustainability Checklist is set out, with measures to be considered set out under the following sections:

- Biodiversity: Populations and Habitats; and Net Gain
- Water Efficiency: Limit Use and Re-Use
- Energy Efficiency: Efficiency; Reduce; and Generation
- Design: Location and Layout; Features; Materials; and Circular Economy
- Climate Resilience: Flooding; and Heat Stress

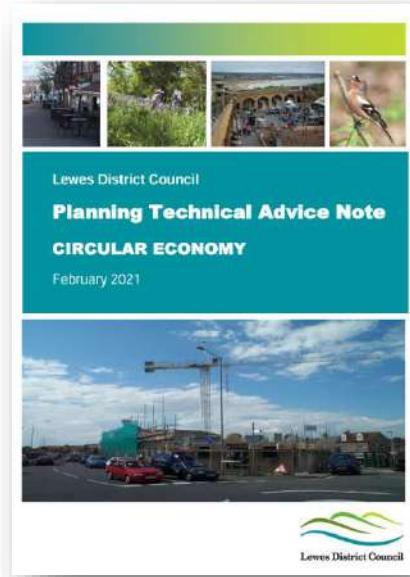


### Lewes District Council Planning Technical Advice

#### Note: Circular Economy (February 2021)

3.23 The Technical Advice Note (TAN): Circular Economy, which was prepared alongside the TAN: Sustainability in Development, is directed towards encouraging a circular economy approach for the development sectors.

3.24 The TAN provides a definition of the Circular Economy, in addition to expectations for new development with respect to the adoption of Circular Economy principles and the minimisation of excavation, demolition, construction and operational waste generation. As noted above, a Sustainability Checklist has been devised for major planning applications, which includes a requirement for the consideration of Circular Economy principles within the design of proposed development.



## Wivelsfield Parish Neighbourhood Plan 2015 – 2030 (September 2016)

3.25 The Wivelsfield Parish Neighbourhood Plan sets out the following vision for the Parish:

*The Neighbourhood Plan's Vision aims to ensure that Wivelsfield Parish develops in the way the community wants in maintaining the rural environment, an attractive village centre, a viable community, housing for all and better facilities and services.*

3.26 In addition objectives relating to key themes are set out, including the following:

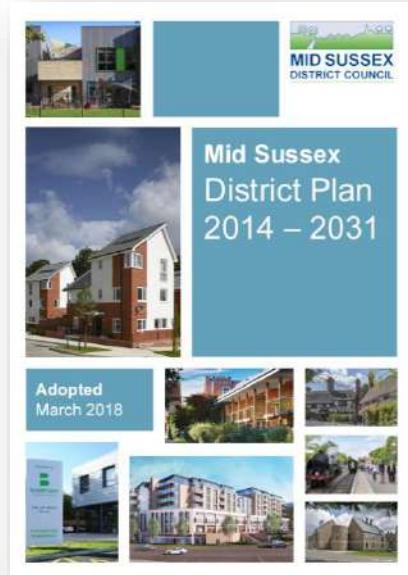
- Housing
  - To provide a mix of dwelling types including particularly smaller dwellings for young families and older people wishing to downsize, and starter homes for younger people and key workers.
  - To provide some affordable homes for local people.
- Environment
  - To safeguard the conservation area and listed heritage building of the Parish.
  - To maintain and protect the rural character of the Parish and its landscape features.
  - To establish, maintain, protect and enhance local green spaces.
- Community Services
  - To protect the community assets of the Parish.
  - To support and enhance key community services.
- Transport
  - To encourage safe walking, cycling and horse riding.
  - To manage car parking effectively.



### Mid Sussex District Plan 2014 – 2031 (March 2018)

3.27 The Mid Sussex District Plan sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies. The following policies are considered of great relevance to this proposal:

- **Strategic Objective 1** seeks to promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change.
- **Strategic Objective 6** seeks to ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks.
- **Policy DP39: Sustainable Design and Construction** states that all development proposals must seek to improve the sustainability of development and should, where appropriate and feasible according to the type and size of development and location, incorporate the following measures:
  - Minimise energy use through the design and layout of the scheme, including through the use of natural lighting and ventilation;
  - Explore opportunities for efficient energy supply through the use of communal heating networks where viable and feasible;
  - Use renewable sources of energy;
  - Maximise efficient use of resources, including minimising waste and maximising recycling/re-use of materials through both construction and occupation;
  - Limit water use to 110 litres/person/day in accordance with Policy DP42: Water Infrastructure and the Water Environment;
  - Demonstrate how the risks associated with future climate change have been planned for as part of the layout of the scheme and design of its buildings to ensure its longer term resilience.
- **Policy DP42: Water Infrastructure and the Water Environment** states that new development proposals must be in accordance with the objectives of the Water Framework Directive, and



accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water quality, water supply and wastewater treatment and consequently the optional requirement under Building Regulations – Part G applies to all new residential development in the District. Development must meet the following water consumption standards:

- Residential units should meet a water consumption standard of 110 litres per person per day (excluding external water use).
- Non-residential buildings should meet the equivalent of a 'Good' standard, as a minimum, with regard to the BREEAM water consumption targets for the development type.

Development proposals which increase the demand for off-site service infrastructure will be permitted where the applicant can demonstrate;

- that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, plans must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and
- that there is adequate water supply to serve the development environment.

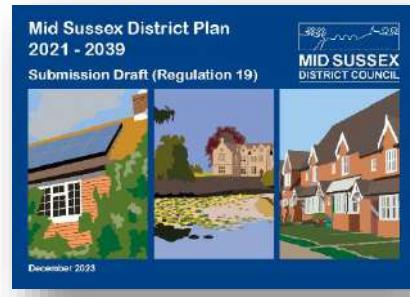
Planning conditions will be used to secure necessary infrastructure provision.

Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water.

The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.

**Mid Sussex District Plan 2021 – 2039 (Regulation 19;  
December 2023; with Main Modifications July 2024)**

3.28 The draft District Plan 2021 – 2039 comprises an updated vision, strategy, set of site allocations and policies that will supersede the adopted Mid Sussex District Plan 2014 – 2031. Whilst not yet formally adopted, when accounting for the Schedule of Main Modifications set out in July 2024, the policies of relevance to the proposed development detailed within the draft District Plan 2021 – 2039 include:



- **Strategic Objectives: Environment** seeks to protect and enhance the natural, built and historic environment by:
  - Creating and maintaining easily accessible high quality green and blue infrastructure in the right places to encourage active travel, improve physical and mental health, support biodiversity, and address climate change mitigation and adaptation.
  - Promoting development that embodies the 20-minute neighbourhood principles and makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change.
  - Promoting well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence.
  - Conserving and enhancing valued landscapes for their visual, historical and biodiversity qualities.
  - Protecting valued characteristics of the built environment for their historical and visual qualities.
  - Ensuring that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes as a priority the provision of efficient and sustainable transport networks.
  - Protecting and enhancing the natural environment, achieving net gains in biodiversity, nature recovery and tree cover.
- **Policy DPS1: Climate Change** states that the Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change. This will be achieved by:

Reducing carbon emissions

1. Development will be required to demonstrate that measures have been taken to reduce carbon emissions, including improvements in energy efficiency and in the design and construction of buildings. This includes new buildings and the conversions of existing buildings. Detailed requirements are set out in Policies DPS2: Sustainable Design and Construction, DPS3: Renewable and Low Carbon Energy Schemes, and the Mid Sussex Design Guide SPD.
2. The Council will support renewable and low carbon energy schemes in line with the requirements set out in Policy DPS3: Renewable and Low Carbon Energy Schemes.
3. Development should embed the principles of the 20-minute neighbourhood and local living and prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles. Detailed requirements are set out in Policies DPT1: Placemaking and Connectivity; DPT3: Active and Sustainable Travel; and DPB1: Character and Design.
4. Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be required to demonstrate that opportunities have been taken to reduce these emissions. This includes proposals that may use these other greenhouse gases in their design and operation, for example, refrigerants and air conditioning systems.

#### Maximising carbon sequestration

5. Development will be required to protect existing trees, woodland and hedgerows and their soils and seek opportunities to plant new hedgerows and appropriate species of trees in appropriate places including street trees. Detailed policy requirements are set out in Policy DPN4: Trees, Woodland and Hedgerows.
6. Development will be required to protect existing carbon sinks and stores and take opportunities to provide nature-based solutions for carbon capture and sequestration.
7. Development will be required to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage. Detailed policy requirements are set out in Policy DPN1: Biodiversity, Geodiversity and Nature Recovery.

#### Climate change adaptation and mitigation

8. Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, food security, flood risk and water supply. Detailed policy requirements are set out in Policies DPS2: Sustainable Design and Construction and DPS4: Flood Risk and Drainage.

9. Development will be required to incorporate green and blue infrastructure and nature-based solutions to moderate surface and air temperatures, increase biodiversity and as part of sustainable drainage systems. Detailed requirements are set out in Policies DPB1: Character and Design; DPS4: Flood Risk and Drainage; and DPN3: Green and Blue Infrastructure.
10. Development will be required to achieve a net gain in biodiversity and contribute to ecological networks and the Local Nature Recovery Strategy. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.
11. The Council will seek adaptation and mitigation measures that improve resilience to climate change and allow communities, businesses, buildings, infrastructure and ecology to adapt to the impacts of climate change.

- **Policy DPS2: Sustainable Design and Construction** states that all development must submit a proportionate Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability and includes incorporation of measures set out at Principle DG37 of the Mid Sussex Design Guide SPD.

#### Zero carbon development

Unless it can be demonstrated that doing so is not technically feasible or unviable, using a fabric first approach, all new build development must achieve zero operational GHG emissions by reducing heat and power demand and then supplying all (regulated and unregulated) operational energy through on-site renewables.

#### Energy Use

The carbon reduction requirements for achieving net zero development must be met by using a fabric first approach following the energy hierarchy:

- i. Minimise the demand for energy.
- ii. Maximise energy efficiency.
- iii. Utilise renewable energy.

All developments must include decentralised, renewable or low carbon energy provision. Residential and non-residential renewables such as solar panels (including ground mounted) and associated infrastructure, will be supported in principle but should seek to minimise the visual impact wherever possible

Heating to all new build developments and major refurbishments shall be provided using renewable energy (not fossil fuels).

Residential new build: Until superseded by higher national standards, development must achieve a 100% emissions reduction against the Target Emissions Rate (TER) on all new build dwellings. Compliance shall be demonstrated via the Standard Assessment Procedure (SAP) calculations and detailed submitted as part of an Energy Statement.

Development is encouraged to exceed this standard where feasible and viable, and alternative routes such as Passivhaus standards will be supported where evidence is provided. Passivhaus compliance shall be evidenced by submitting full Passivhaus Planning Package outputs demonstrating that Passivhaus certification is achievable.

Non-residential new build: Major development must achieve maximum credits in the “Energy performance”, and “Prediction of operational energy consumption” and “Beyond zero net regulated carbon” categories of BREEAM (or equivalent) to demonstrate that the development has surpassed net zero regulated emissions.

All minor new build developments have the option to demonstrate achievement of zero operational GHG emissions through the Part L of Building Regulations rather than a BREEAM assessment.

Evidence must be provided to demonstrate every feasible and viable option has been explored to fully achieve the net zero target on-site. Only in exceptional circumstances, where any shortfall is identified, appropriate mitigation should be formally agreed with the Council.

#### Assessment frameworks

BREEAM Technical Standards: Planning applications of a scale and nature defined in the table below, must be accompanied by a pre-assessment, demonstrating how the BREEAM Technical Standards and/or any future replacement standards, will be met.

Evidence demonstrating the project has been registered with BRE during the design stage shall be submitted with any application and conditions/ requirements will be imposed to secure appropriate final (post-construction/ post-refurbishment stage) certification to demonstrate compliance with this policy.

Where Passivhaus certification is being sought, a ‘preconstruction compliance check’ completed by a Passivhaus certifier will be required; secured by condition and upon completion, a Quality Approved Passivhaus certification for each dwelling/building will be required.

Development, as defined below, will be required to meet the relevant minimum defined standards until they are superseded by higher national standards.

Development Type	Scale of Development	Minimum Standard
Non-residential and mixed-use new build	Major	BREEAM Excellent
Non-residential Refurbishment and/or extension	Major	BREEAM Excellent – Refurbishment and Fit Out Technical Standards

Post-occupancy monitoring: All major non-residential new build developments must achieve a credit for POE in the category Man 05 Aftercare under the relevant BREEAM scheme.

Developers should share their POE information with the built environment sector to ensure transparency and inform wider lesson learning.

#### Embodied Carbon

Development proposals must prioritise retention and retrofit of existing buildings or structures to capture the embodied carbon associated with the building's original construction; unless it can be demonstrated to be unviable to do so.

Major new build developments: Major new build developments must undertake a whole life-cycle (WLC) carbon assessment using a nationally recognised assessment methodology. Relevant credits in BREEAM, or equivalent, shall be achieved to demonstrate reasonable endeavours have been made to minimise embodied carbon.

The use of sustainably sourced wood in construction, particularly from local sources, is strongly encouraged.

#### Householder development

Proposals for householder development must demonstrate that they have been designed to be as energy efficient and sustainable as possible through good design and by:

1. Increasing the energy efficiency of the proposed new elements, and
2. Increasing the energy efficiency of other parts of the building.

All measure should be set out in a proportionate Sustainability Statement.

#### Prevent overheating

All new development must demonstrate how design measures have been incorporated to:

3. Minimise potential overheating such as through the layout, orientation and design of buildings.
4. Maximise passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided. Green and blue infrastructure incorporated in line with Policy DPN3: Green Infrastructure to provide natural cooling and shading

#### Water resources and water efficiency

New development proposals must accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water resources, water quality, water supply and wastewater treatment.

All residential new build: Development must meet a maximum water consumption standard of 85 litres per person per day to minimise the impact of the development on water resources and water quality.

Major non-residential new build: Development must achieve 3 credits in BREEAM category Wat 01 and demonstrate reasonable endeavours to achieve an 'Outstanding' rating overall.

All development will be required to meet the relevant minimum standards set out above until they are superseded by higher national standards.

Sustainable water consumption rates can be achieved through incorporation of measures to reduce water use and reuse water including:

- Water efficient fittings and appliances
- Rainwater harvesting, including incorporation of rainwater butts
- Greywater recycling

#### Minimise waste

In accordance with relevant policies in the West Sussex Waste Local Plan, all development must support the circular economy by minimising construction, demolition and excavation waste disposed of in landfill and follow the waste hierarchy to maximise recycling and re-use of material.

New development must be designed with adequate and easily accessible storage space that supports separate collection of dry recyclables and food waste, as well as residual waste taking account of guidance in the Mid Sussex Design Guide SPD.

- **Policy DPS5: Water Neutrality** states that all development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design

and offsetting of any net additional water use of the development. This is to be achieved by ensuring that:

Water Efficient Design

- a) New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day.
- b) New non-domestic buildings achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard or an equivalent standard set out in any future update.

AND

Offsetting Water Use

- c) Development proposals demonstrate that having achieved water efficient design, any remaining mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water within the WRZ compared with pre-development levels.

Water Neutrality Statement

A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water supply, water efficient design and offsetting. The statement shall provide, as a minimum, all of the following:

- a) Baseline information relating to existing water use within a development site.
- b) Full calculations relating to expected water use within a proposed development.
- c) Full details of how any remaining water use will be offset.

Offsetting Schemes

A local authority- and South Downs National Park-led water offsetting scheme will be introduced to bring forward development and infrastructure supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the Plan period.

Development proposals are not required to utilise the local authority- and South Downs National Park-led offsetting scheme and may bring forward their own offsetting schemes. Any such development proposals will need to have regard to the local authority- and South Downs National Park-led offsetting scheme and associated documents.

Offsetting schemes can be located within any part of the WRZ, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area in Horsham district.

#### Alternative Water Supply

Where an alternative water supply is to be provided, the Water Neutrality Statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.

#### Areas of Serious Water Stress

Should the need to demonstrate water neutrality no longer be required, new residential development and non-domestic buildings must be designed to meet the standards set out in DPS2: Sustainable Design and Construction. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied.

- **Policy DPS6: Health and Wellbeing** states that, to enable and support healthy lifestyles and address health and wellbeing needs in Mid Sussex, all new development must be designed to achieve healthy, inclusive and safe places by embedding the principles of the 20-minute neighbourhood and 'local living'.

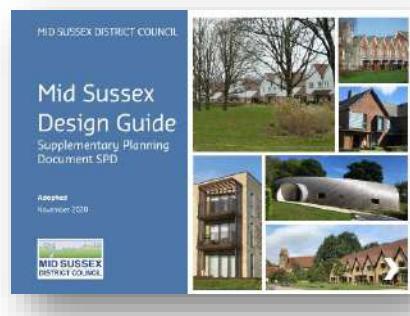
In order to maximise opportunities to enable healthy lifestyles, all new development must address all of the following (where applicable for the type of development proposed):

1. Be of high quality in its design and construction and be set within an attractive environment.
2. Be well-designed to ensure legibility of layout and the public realm including through the use of materials.
3. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime.
4. Prioritise active travel such as walking and cycling and sustainable transport such as public transport, and take opportunities to enhance recreational routes and public rights of way.
5. Incorporate green and blue infrastructure and biodiversity enhancements.
6. Provide high quality private outdoor space and publicly accessible open and green space.
7. Support and facilitate healthy eating including through the provision, where possible, of local and domestic food production such as allotments, community growing spaces and community orchards.

8. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, exercise, socialise and interact.
9. Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, air quality, crime, access to education and employment, local amenity, and access to open space and the countryside.
10. Incorporate measures to provide resilience against the effects of climate change including overheating, flood risk and drought.

**Mid Sussex Design Guide Supplementary Planning Document (SPD; November 2020)**

3.29 The Mid Sussex Design Guide Supplementary Planning Document (SPD) provides a number of design principles that aim to deliver high quality new development across Mid Sussex. It is stated that all new development should be designed to high environmental standard. This applies to both the building design and layout, which should have regard to the following:



- Sustainable construction principles including maximising energy and water efficiency, minimising carbon emissions and use of resources;
- Optimising development opportunities especially on brownfield sites and in locations close to facilities or with good transport links;
- Organising development around green transport principles that reduce travel distances, prioritise pedestrian and cycle movement and integrate public transport;
- Planning schemes around Green Infrastructure provision that is underpinned by: (a) healthy living and well-being principles; (b) helping to deliver a net gain in bio-diversity; (c) responding to the beauty of the natural landscape and ensuring that natural features are retained and enhanced; and
- Designing for adaptation and resilience to future weather events (drier/hotter summers and wetter/warmer winters).

**Haywards Heath Town Council Neighbourhood Plan  
2014 – 2031 (December 2016)**

3.30 The Haywards Heath Town Council Neighbourhood Plan sets out proposed local planning policies for the development of the town and its community. This includes the setting of a Vision for Haywards Heath to achieve:

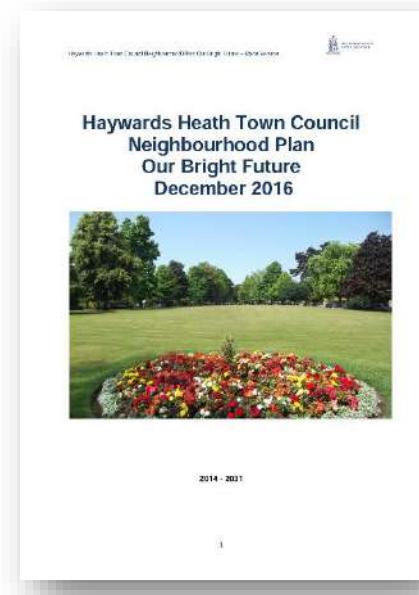
- A healthy, family focused and safe town;
- A strong community spirit embracing both young and older people;
- Supporting a vibrant economy;
- Having excellent public services; and
- High quality public spaces with the countryside on its doorstep.

3.31 To aid the achievement of this Vision, six key aims have been set:

- That the Plan should set out long term policies and promote Sustainable Development.
- That the policies should maintain the rural setting of the town.
- That the Leisure and Community Facilities should be retained/improved.
- That the Plan should support a vibrant economy.
- That the Plan should improve infrastructure in the town.
- That the Plan prioritises making best use of Brownfield sites.

3.32 Specifically in relation to sustainability and energy matters, the following policies are also set out within the Haywards Heath Town Council Neighbourhood Plan:

- **Policy E8** states that new major development proposals, defined as 10 or more dwellings, 1,000sqm floorspace or more, or application sites over 1 hectare, will be required to be designed to support making the town more sustainable by having regard to the following matters when designing the scheme:
  - provision of recycling, including commercial waste within the scheme
  - submission of details of how the scheme will promote walking, cycling, public transport use and promotion of car sharing



- submission of details on how the scheme will manage energy and water use
- demonstrate how the scheme would contribute to the improvement of the health and wellbeing of the community

## Other Considerations

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### Declaration of a Climate Emergency (July 2019)

3.33 In July 2019, Lewes District Council declared a Climate Emergency, as well as agreeing a wide range of measures to reduce green-house gas emissions to net zero, and to become fully 'climate-resilient' by 2030. To achieve this, the following measures were proposed:

- The development of a Climate Change Strategy to address all inward and outward-facing council functions and to implement appropriate monitoring and reporting mechanisms. In doing so, the Council plans to: ensure all strategic decisions, budgets and approaches to planning decisions are in line with a shift to net zero greenhouse gas emissions by 2030; ensure that appropriate resources and capacity are put in place to progress the actions needed to address the 'Climate Emergency' effectively; and, support and work with relevant agencies and stakeholders towards making the entire district zero-carbon and climate resilient by 2030.
- Requesting that a Community Climate Change Forum is convened with representation and participation from across the district. Representatives should include those from local communities, parish and town councils, organisations, businesses, education, nature groups, agriculture, food, health and transport groups.
- Requesting that the Council is proactive in including young people in the 'Climate Emergency' process.
- Reporting annually to the Audit and Standards Committee on the level of investment in the fossil fuel industry in the Council's pension plan and other investments, and to review the Council's investment strategy to give due consideration to climate change impacts in the investment portfolio.
- Ensuring all reports prepared for the 2020/21 budget take into account the actions the Council plan to take to address the 'Climate Emergency'.
- The Cabinet portfolio holder will be required to write to the government to set out the Council's intentions and the call on the UK government to grant the powers, resources and funding to make this possible. The same will be required of Local MPs.

### **Climate and Sustainability Action**

3.34 Mid Sussex Council is committed to playing its part in supporting international and national plans to allow prosperity to continue, but to move away from old and polluting ways of doing things. Key actions that the Council is taking to aid in the achievement of this include:

- The use of the United Nations (UN) Sustainable Development Goals in the preparation of future plans and policies, to guide thinking and reporting on wider measures of social, environmental and economic wellbeing.
- The commissioning of climate change experts in June 2021 to advise how to create an effective pathway to reduce greenhouse gas emissions in line with the government's 2050 net-zero target.
- Requesting that the Council is proactive in including young people in the 'Climate Emergency' process.
- With the guidance of the recommendations of the Net Zero report, the updating of policy approaches to environmental sustainability, through the development of the Sustainable Economy Strategy and the review of the Local Plan during 2021 – 2022.

## 4. SUSTAINABILITY STATEMENT

- 4.1 The Sustainability & Energy Statement for the proposed development is divided into two main parts.
- 4.2 The sustainability strategy for the proposed development has been assessed in line with the guidance set out within relevant policies of the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, the Lewes District Council Renewable Energy and Energy Efficiency Supplementary Planning Document, the Lewes District Council Planning Technical Advice Note: Sustainability in Development, the Lewes District Council Planning Technical Advice Note: Circular Economy, the Wivelsfield Parish Neighbourhood Plan 2015 – 2030, the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation), the Mid Sussex District Plan 2014 – 2031, the Mid Sussex Design Guide Supplementary Planning Document, the Haywards Heath Town Council Neighbourhood Plan 2014 – 2031, and the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications) encourage new development to incorporate high-quality design measures, and therefore represents best practice guidance to meet high standards of sustainable design and construction.
- 4.3 The carbon dioxide (CO<sub>2</sub>) emissions reduction strategy for the proposed buildings to be delivered as part the development is based on the energy hierarchy to provide a rigorous methodology, which maximises cost-effective opportunities for emissions reduction, as detailed in Section 5.

### **Sustainable Design and Construction**

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- 4.4 In line with the guidance provided in the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, the Wivelsfield Parish Neighbourhood Plan 2015 – 2030, the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation), the Mid Sussex District Plan 2014 – 2031, the Mid Sussex Design Guide Supplementary Planning Document, the Haywards Heath Town Council Neighbourhood Plan 2014 – 2031, and the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications), the sustainability features of the proposed development are outlined below.
- 4.5 Issues related to energy conservation, renewables and reducing greenhouse gases follow in a dedicated section.

### **Making Effective Use of Land**

- 4.6 Figure 4.1 below shows the location of the development site with respect to its surroundings.

**Figure 4.1 Current site**



- 4.7 As shown above, the proposed development site is located at the edge of an existing settlement, with residential properties located to the west and north of the site within the town of Haywards Heath. A range of community facilities and amenities are located within Haywards Heath and the surrounding settlements, including Burgess Hill to the southwest, including primary schools, secondary schools, health centres, shops, restaurants and areas of public open space, all within walking or cycling distance of the application site.
- 4.8 The proposed development is therefore considered to be an extension of the existing town of Haywards Heath, and therefore makes effective use of land, located within an established settlement.

#### **Location and Transport**

- 4.9 Accessibility to public transport connections contributes to the sustainability of a site's location. Haywards Heath railway station is located approximately 3km to the north of the site. This station provides frequent access to a range of destinations, including London Victoria, Gatwick Airport, Brighton, Bedford, Cambridge, Ore, Eastbourne and Littlehampton, via Southern, Thameslink and Gatwick Express services.
- 4.10 The nearest bus stops are located on Fox Hill (B2112), approximately 400m from the centre of the site, and less than 200m north of the proposed site entrance. These stops are served by the 149 service, which provides access to destinations between Scaynes Hill and Chailey School, the 166 service, which runs between the centre of Haywards Heath and Lewes, and the 271 and 272 services, which provide access between Crawley and Kemp Town or the Royal Sussex County Hospital. Whilst the proposed development will not deliver additional public transport services, it is considered that the increased patronage from the site will support the long-term viability of the

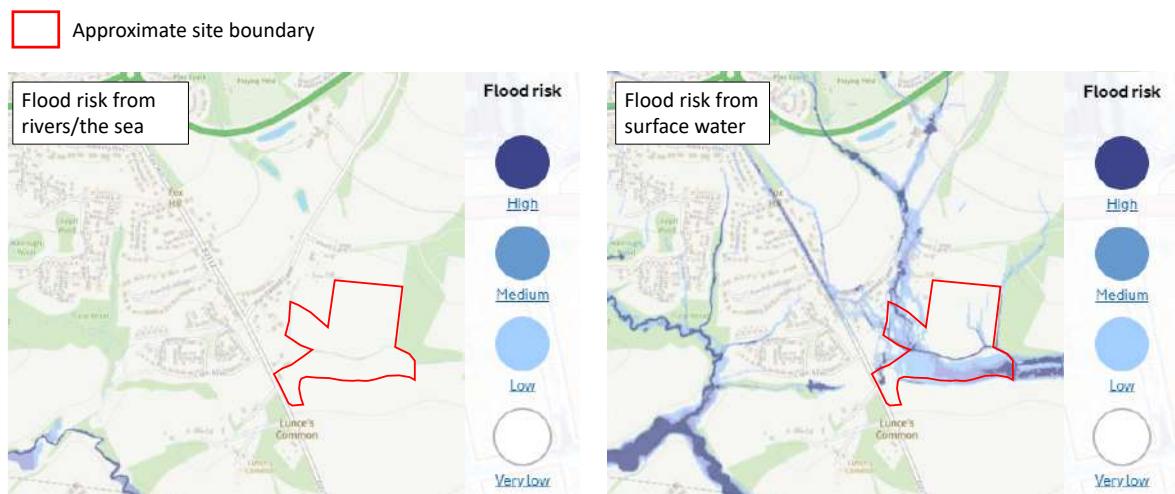
existing services. It is also highlighted that a puffin crossing is to be incorporated to the north of the site, which will facilitate and encourage pedestrian access from the site to the bus stops located on Fox Hill, as well as the nearby primary school.

- 4.11 There are a number of existing footways that provide access to the site, including a footway along Lunce's Hill, which provides a connection to Haywards Heath Town Centre to the north. In addition, a Public Right of Way (PRoW) is located to the west of the site. This PRoW, referred to as Footpath WIV/15/1, offers onward connections to Burgess Hill and Wivelsfield via a number of additional footpaths, and routes through fields and agricultural land. With respect to cycling facilities, provision is generally on-road, however dedicated facilities are present along Rocky Lane (A272). These facilities include a combined footway / cycle track on the northern side of the Rocky Lane (A272) that runs from Fox Hill Roundabout to High Bank, and an additional combined footway / cycle track on the southern side of the section of road between Virginia Drive and Rocky Drive, which runs adjacent to Rocky Lane (A272) before routing south onto Old House Land.
- 4.12 As detailed within the Transport Assessment, prepared by Stantec, the internal layout of the proposed development will ensure future residents and site users will be able to easily walk and cycle within the local community. A site access point is to be provided for vehicles, pedestrians and cyclists from Lunce's Hill (B2112), with a 3m wide combined footway and cycle path to be provided in the northern verge of the proposed site access, where cycle provision leaves the carriageway along Fox Hill (B2112). In addition, it is highlighted that the site layout will be designed to ensure permeability for pedestrians and cyclists, with routes to be aligned towards key desire lines through the site, and linking to the external access point. This will aid in encouraging the use of sustainable modes of transport.
- 4.13 Both cycle and car parking proposals for the scheme will be confirmed as part of future Reserved Matters Applications. Parking provision will adhere to East Sussex County Council and West Sussex County Council's most up-to-date parking standards, unless otherwise agreed. It is also noted that the indicative layout of the proposed development is considered to include for sufficient space to accommodate the parking needs of up to 130 dwellings.
- 4.14 To encourage a mode-shift away from single occupancy vehicles, a number of measures are proposed, including the provision of pedestrian and cycle routes, as described above. In addition to this, a Residential Travel Plan will be implemented, identifying a number of soft measures to encourage the use of sustainable and active modes of transport, in lieu of private cars. A mode-shift assessment has been undertaken for the proposed development, and targets have been set for each mode of transport to achieve a 20% shift away from single occupancy vehicles.
- 4.15 Based on the information contained within the Transport Assessment, it is considered that there is no reason that the proposed development should be refused on highways grounds.

### Reducing Flood Risk and Surface Water Run-off

4.16 Information contained within the Flood Risk Assessment, prepared by RPS, confirms that the majority of site falls within Flood Zone 1, indicating a less than 1 in 1,000 (0.1%) chance of flooding from rivers or the sea per year. In addition, and as demonstrated in Figure 4.2 below, the vast majority of the site is at very low risk of flooding from surface water sources. Some areas surrounding the Pellingford Brook in the southern section of the site and along the western boundary, as well as areas within the eastern section of the site associated with existing field drains, are shown to be at low to high risk of flooding from surface water sources. Details on the measures that are to be employed as part of the proposed development to mitigate this risk are set out within the Flood Risk Assessment, prepared by RPS.

**Figure 4.2 Extract from the Environment Agency's online flood map**



4.17 The proposed surface water drainage network is set out within the Surface Water Drainage Strategy prepared by RPS, which accompanies this submission.

### Reducing Water Consumption

4.18 The majority of England is under water stress, with more water often being consumed than is available during dry weather. As the population continues to grow, and with changes to the frequency of rainfall events projected as a result of climate change, this situation will be further exacerbated, with even greater pressure exerted on the supply of potable water.

4.19 In order to actively mitigate against this, it is intended that water efficient fittings and appliances shall be installed to target a maximum internal water consumption target of 110 litres per person per day, based on the DCLG water efficiency calculator. Full details of the water consumption calculations are provided in Appendix A2.

4.20 Table 4.1 forms a basis for the residential element of the proposals, subject to changes at later detailed design stages.

**Table 4.1 Proposed water use**

<b>Fitting</b>	<b>Consumption</b>
Low volume dual flush toilets	6 litres (full) / 3 litres (part)
Wash hand basin tap	5 litres per minute
Kitchen sink tap	5 litres per minute
Bath (where fitted)	178 litres capacity (to overflow)
Shower	9 litres per minute
Washing machine	7 litres/kg
Dishwasher	1.25 litres/place setting

4.21 To aid in reducing potable water consumption for external uses, it is recommended that water butts, or similar, be provided for each dwelling to enable rainwater harvesting for irrigation purposes. It is also recommended that drought-resistant and drought-tolerant species be incorporated within the proposed Landscape Strategy to reduce external water demand.

4.22 For the non-domestic element of the proposed development, it is recommended that water-efficient fittings, such as low flush volume toilets and low water use spray taps, be provided to aid the minimisation of internal water consumption. It is also recommended that rainwater harvesting be employed, with collected water used in toilet flushing and other non-potable applications, such as the irrigation of soft landscaping. Additional measures may also be considered for incorporation during the detailed design stage, such as the employment of leak detection systems and solenoid shut-off valves controlled with PIR systems.

#### **Materials and Waste**

4.23 Materials should be responsibly sourced by the main contractor, and be specified to have a low embodied impact. Materials with a low embodied impact, as defined within the BRE Green Guide to Specification, should be selected for use in the building design and construction.

4.24 The selection of materials is determined by a variety of factors, such as the architectural context, design rationale, embodied carbon and maintenance requirements. For the proposed development, consideration will be given to the lifecycle environmental performance with materials selected in consideration of the BRE's Green Guide to Specification, aiming for A or B rated materials wherever possible.

4.25 The use of locally sourced materials will be prioritised wherever possible to reduce the impacts associated with the transportation of materials. Using materials produced in the local area will also aid in developing the identity of the development, by ensuring it is in line with the local character and context. For the proposed development, there will be a focus on sustainable design, with materials selected that are in keeping with the local vernacular and landscape character, aiming for locally sourced materials where possible.

4.26 During detailed design of the building fabric, consideration will be given to minimising the environmental impact of materials, by selecting non-toxic and robust materials to ensure longevity and a minimal impact on the health of occupants.

4.27 Timber will be selected and purchased in consideration of sustainability certification. It is intended that all structural timber elements along with any timber used for temporary uses, such as scaffolding, will be sustainably sourced, e.g. from FSC and/or PEFC sources.

4.28 Consideration has been given to the reduction and recycling of waste during both the construction and operation phases.

4.29 During the construction phase, the principal contractor will be required to implement a Site Waste Management Plan (SWMP), which will detail who will be responsible for resource management, which types of waste will be generated, how the waste will be managed (e.g. reduced, reused or recycled), which contractors will be used, and how the quantity of waste generated by the project will be measured. Should any demolition be required on the site, demolition contractors will incorporate best practice measures to maximise the recovery of materials from the demolition site for reuse or recycling, in line with the guidance set out by the Institute of Civil Engineers' (ICE) "Demolition Protocol".

4.30 To encourage a greater proportion of the operational waste to be diverted from landfill, it is proposed to provide dedicated spaces of sufficient size and within convenient locations for each of the new dwellings and the non-domestic building. All waste collection and storage facilities will be considerate of Building Regulations and Council requirements. A dedicated external waste storage area for refuse and recycling will also be allocated for each dwelling to be delivered as part of the proposed development, as well as the non-domestic building.

### **Tackling Increased Temperatures and Drought**

4.31 In order to protect the development against overheating in the future, a number of key design features have been proposed to ensure the proposals are resilient to increased temperatures, which may be experienced as a result of climate change. The following measures are deemed to contribute to the mitigation of the effects of climate change:

- The facades of the dwellings and non-domestic building will have a balanced amount of glazing to mitigate direct solar heat gain whilst optimising daylight penetration.
- Openable windows on multiple aspect spaces will be integrated to provide a passive ventilation strategy that utilises crossflow ventilation to maximise the potential for natural ventilation within the dwellings and non-domestic building.
- Internal heat gains will be minimised through the use of energy efficient lighting and equipment, the anticipated employment electric-only heating systems, such as air source heat pump (ASHP) technology, and the insulation of hot water distribution pipework to prevent heat loss into the dwelling spaces and the occupiable spaces of the non-domestic building.

### **Ecology and Landscape**

4.32 The Ecological Assessment, prepared by Derek Finnie Associates, confirms that no statutory or non-statutory nature conservation designations are present within the site. The nearest statutory designated site is Ashford Forest Special Area of Protection (SPA) / Special Area of Conservation (SAC), located 12.8km to the east, whilst Lewes Downs SAC is located 13.5km to the southeast. There are several areas of Ancient Woodland present within the wider surroundings of the site, including a woodland block contiguous with the eastern boundary of the site that is considered to be Ancient Replanted Woodland. It is considered that all statutory and non-statutory nature conservation designations are well separated from the site and, given the scale and nature of the proposed development, in addition to the provision of extensive areas of open space that will accommodate much of the associated recreational activity, the identified designated sites are unlikely to be adversely affected.

4.33 Surveys undertaken in support of the Ecological Assessment identified the following habitats to be present within the site boundaries: broad-leaved trees (scattered); hedgerows; scrub; semi-improved grassland; dry ditch; watercourse; and buildings and hardstanding. Of these habitats, a number of existing tree lines and hedgerows have been identified as Habitats of Principle Importance. The semi-improved grassland, which accounts for most of the site area, is considered to be of negligible ecological value, due to its limited ecological diversity and moderately intensive management. It is highlighted, however, that the strips of grassland located either side of one existing hedgerow are considered to be of local value, as are all existing hedgerows, and the watercourse. To facilitate the proposed development, approximately 60% of the semi-improved grassland would be lost. It is highlighted, however, that the internal roadwork will seek to adopt the existing farm accesses where possible, which will aid to minimise the loss of existing hedgerows. In addition to this, the proposed

stream crossings will be located to align with the existing culverts, which will similarly aid to mitigate potential adverse impacts. A minimum 30m buffer will also be retained to the Ancient Woodland present to the east of the site, which will ensure no direct impacts to this feature. It is also highlighted that this area of woodland is highly degraded in terms of its ecological value due to its replanting with coniferous trees. It is noted that the proposed conversion of the existing barn may result in the loss of several swallow nest sites, however the implementation of recommended mitigation measures will ensure the impacts of these losses are reduced.

4.34 No evidence of badger activity was identified within the site, however it is noted that some habitat present may have the potential to support this species with respect to foraging resources, if they are present within the wider area. Surveys of the site suggest that opportunities for foraging and roosting bats are present, particularly in relation to the existing barn. It is also noted that the improved grassland may offer some limited sub-optimal foraging habitat for this species, in addition to bird species, including swallow. As detailed above, the existing barn has also been identified as potentially containing several swallow nest sites. The site is not considered to offer suitable opportunities for reptile, amphibian, water vole, otter or other faunal species of note.

4.35 A number of mitigation and enhancement measures are recommended within the Ecological Assessment to ensure harm to habitats and species as a result of the proposed development are minimised, and to provide new opportunities for biodiversity, including:

- A significant proportion of the site will comprise green infrastructure, including the creation of new, high-quality habitats.
- The main features of ecological value within the application site boundary, in particular the hedgerows, trees and stream, will be retained and enhanced wherever possible.
- Additional habitat of high ecological value that will be created through the landscape design include:
  - Wildflower meadow;
  - Wet meadow;
  - Native scrub;
  - New native hedges with trees;
  - Improvements to the stream bank; and
  - New tree planting.

4.36 It is considered that, through the employment of the mitigation and enhancement measures set out within the Ecological Assessment, the potential adverse impacts of the proposed development will be offset. A positive residual impact is expected to be delivered at the local scale as a result of the proposed development, due to the integration of extensive green and blue infrastructure.

4.37 It is concluded within the Biodiversity Net Gain (BNG) Report, prepared by Derek Finnie Associates, that, through the delivery of the habitats and features set out above, the proposed development will result in a 10.08% increase in the biodiversity value of habitats, 12.39% in relation to hedgerows and 11.62% for water course within the site boundaries. At the outline planning stage, it is anticipated that the net gains in biodiversity that may be achieved are therefore in compliance with the required of national, Lewes District Council and Mid Sussex District Council policy.

#### Air Pollution

4.38 The Environment Act 1995 requires all Local Authorities to review air quality within the districts. If it appears that any air quality 'Objective' prescribed in the regulations, and in the National Air Quality Strategy, is not likely to be achieved, then the local authority must designate the affected area as an Air Quality Management Area (AQMA).

4.39 As highlighted within the Air Quality Assessment prepared by RPS, the site location is not specified as an AQMA. It is noted that the closest declared AQMA to the site is located approximately 7.5km to the southwest of the site, within the administrative boundary of Mid Sussex District Council. It is also highlighted that there are two designated AQMAs within the administrative boundary of Lewes District Council, both of which are located in excess of 12km from the proposed development site.

4.40 The Air Quality Assessment concludes that, during the construction phase, impacts on local air quality have the potential to occur, due to dust emissions generated from demolition, earthworks, handling and disposal of soil, wind-blown particulate material from stockpiles, handling of loose construction materials, and the movement of vehicles, both on- and off-site. In order to mitigate potential impacts on local air quality during the construction phase, it is recommended that a dust management plan (DMP) be prepared, or a dust and air quality-related contribution be included within a construction environmental management plan (CEMP), and agreed with the local authority. The DMP or CEMP should include details of measures to be incorporated to control dust and general pollution from the site, as well as details of any monitoring schemes that may be implemented, where appropriate. Recommended best practice mitigation measures may include: mechanisms to minimise the number of vehicle movements to and from the site; discouragement of on-site vehicle idling; minimisation of on-site parking; and the provision of secure cycle parking and encouragement of the use of public transport. Through the implementation of the mitigation measures outlined within the Air Quality Assessment, the residual impacts of the proposals on local air quality during construction will not be significant.

4.41 Modelling undertaken to support the Air Quality Assessment indicates that, with the proposed development in place, the predicted nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) concentrations at existing sensitive receptors in the surrounding area will be below the relevant short and long-term Air Quality Strategy (AQS) objectives. When considering the projected change in NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations in the context of absolute predictions, the potential impacts of the proposed development on existing sensitive receptors is considered to be negligible. In addition, it is noted within the Air Quality Assessment that the AQS objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are likely to be met at the facades of the dwellings to be delivered as part of the proposed development. It is therefore concluded that future occupants of the proposed development should be exposed to acceptable air quality.

4.42 It is therefore concluded that the ambient air quality at the proposed development site will not have a significant effect on future residents and site users, and that there will also be no significant impact on existing sensitive receptors in the surrounding area.

#### **Noise Pollution**

4.43 As detailed within the Noise Impact Assessment Report, prepared by RPS, the dominant source of noise affecting the proposed development site is vehicular movement present on Lunce's Hill to the west. The Noise Risk Assessment has been undertaken to establish the likelihood of an adverse effect occurring on the proposed development from existing transportation noise. This Assessment indicates that the part of the site that is located in closest proximity to Lunce's Hill would be at a high risk of adverse noise impacts from existing noise transport during both the day and night. However, the likelihood of an adverse impact falls below 'medium' at a distance of approximately 60m from Lunce's Hill. It is therefore noted that a stand-off from Lunce's Hill would be recommended to reduce the likelihood of an adverse impact occurring.

4.44 In terms of external noise levels within the gardens of the proposed dwellings, it is highlighted that British Standard (BS) 8233 states that external noise levels should be limited so as to avoid annoyance in gardens of proposed dwellings. Modelling undertaken to support the Noise Impact Assessment Report indicates that the noise levels within some parts of the site will exceed 55 decibels (dB), which is a level that BS8233 states should not normally be exceeded. However, with the indicative layout in place, it is noted that the noise levels within all gardens of the proposed dwellings fall below 55 dB during the daytime when assuming standard 1.8m garden fences are in place. It is also highlighted that the significant majority of the dwellings have a noise level within the associated garden spaces that falls below 50 dB during the day. It is therefore noted that, where dwellings are located in excess of 60m from Lunce's Hill, additional mitigation measures other than the inclusion of standard 1.8m garden fences would not be required, but that some additional measures may be required for plots located within 60m of Lunce's Hill. These additional measures may comprise the inclusion of higher noise screens, or an appropriate housing layout to protect the external amenity spaces.

4.45 With respect to internal noise levels in proposed living room and bedroom spaces, BS8233 recommends that noise levels do not exceed 35 dB during the day, and 30 dB during the night, whilst the World Health Organisation's (WHO) 'Guidelines on Community Noise' notes that there should be no more than 10 events that exceed 45 dB per night. The modelling undertaken to support the Noise Impact Assessment Report indicates that some facades will have a noise level that exceeds 48 dB during the day, and 43 dB during the night when assuming partially open windows. It is therefore recommended that some additional façade treatment be incorporated to reduce internal noise levels to align with those set out within BS8233 at some locations within the site. It is noted, however, that for dwellings that are located in excess of 60m from Lunce's Hill, the provision of standard double glazing and ventilation would be sufficient to ensure the achievement of suitable levels of internal noise. Three specifications are recommended with respect to façade mitigation to ensure adequate internal noise levels are achieved within the proposed development:

- Façade Treatment 1: standard double glazing and use of open windows to control overheating;
- Façade Treatment 2: standard double glazing and use of acoustic trickle ventilators to manage overheating; and
- Façade Treatment 3: enhanced double glazing and use of acoustic trickle ventilators to manage overheating.

4.46 It is concluded within the Noise Impact Assessment Report that the use of the recommended façade treatments, or equivalent, will ensure all dwellings will achieve internal noise levels that accord with the BS8233 and WHO guidelines.

4.47 An Overheating Assessment has also been carried out as part of the Noise Impact Assessment Report, prepared by RPS. This Assessment has been undertaken in accordance with the Acoustics, Ventilation and Overheating Residential Design Guide (AVO), and identifies that dwellings located in excess of 60m from Lunce's Hill will be at low risk of experiencing an adverse noise impact as a result of overheating. It is highlighted, however, that properties located in closer proximity to Lunce's Hill will be at 'medium' risk of an adverse noise effect relating to overheating during the daytime and night-time. It is therefore recommended that a stand-off from Lunce's Hill be incorporated to reduce the likelihood of an adverse noise effect relating to overheating. It is concluded, however, that it is unlikely that occupants will be subject to significant adverse noise impacts if the requirements of ADO are achieved.

4.48 The Noise Impact Assessment Report concludes that the noise levels experiences at the proposed dwellings will comply with relevant policies and guidance when employing the recommended mitigation measure. It is therefore considered that, in noise terms, the site is suitable for the proposed development.

### **Ground Contamination**

4.49 As detailed within the Phase I Desk Study, prepared by GRM Development Solutions Ltd, the site is currently used as pasture land, with the ground surface predominantly comprising grass, with the Pellingford Brook entering the site mid-way along the western boundary and flowing to the east through the central site area. There are no historic records of development of the site and, as no potential hazards have therefore been identified, the risk to the proposed development is considered to be very low.

4.50 It is anticipated that the site is underlain by superficial deposits of Head Deposits within the majority of the southern portion of the site, with no superficial deposits recorded to be present within the northern portion. These superficial deposits overlay Upper Tunbridge Wells Sand, which is designated as a Secondary A Aquifer. The Head Deposits have been classified as a Secondary Undifferentiated Aquifer. The site is not recorded to be within a Total Catchment Source Protection Zone (SPZ), and the closest groundwater abstraction licence is located 163m to the north.

4.51 The Pellingford Brook is present across the entire central width of the site, flowing from west to east and continuing north along the western boundary of the site. A drainage ditch is also present along the entire southern boundary of the site and a lake, which was previously used as a reservoir, is located 221m to the north. There are no surface water abstraction licences recorded within 250m of the site.

4.52 Based on the information contained within the Phase I Desk Study, the following potential geotechnical hazards and actions have been identified:

- Allowance should be made for the removal or localised capping of soils in the vicinity of the backfilled pond, located in the south-western corner of the site.
- Whilst gas protection measures are considered unlikely to be required, it is noted that, until a gas monitoring programme is undertaken, it would be prudent to allow for plots in the vicinity of the backfilled pond to adopt gas precautions set out within British Standard 8545:2015.
- The presence of previous buildings, associated localised areas of made ground, the backfilled pond, variable strata, shrinkable clay and trees, may result in a requirement for deepened foundations.

4.53 The Phase I Desk Study concludes that the risk from ground contamination and ground gas is negligible. It is noted that a ground investigation will be required and that this should allow for testing to be undertaken to confirm whether a soil capping system will be required, to determine whether standard water supply pipes will be suitable, and to undertake gas monitoring. The following recommendations are also made:

- Traditional trench fill foundations are generally considered to be suitable, however the deepening of foundations through localised areas of made ground and soft/loose ground near water courses may be required. Similarly, it may be necessary to provide deepened foundations within areas of the site underlain by Head deposits that are likely to be variable in character and strength. This should be anticipated due to the inherent variability and poor strength of this form of deposit. It is also noted that piled foundations cannot be ruled out at this stage.
- It is recommended that the use of suspended floors be allowed for, with voids to be included for where properties are located within proximity to trees and where cohesive soils are present.

#### Light Pollution

4.54 As outlined in the Lighting Impact Assessment, prepared by RPS, it is anticipated that the proposed development will have a minor adverse impact on the surrounding area with respect to light pollution. It is noted that, whilst there is potential for light spill to occur in some locations of the site in the post-development context, the impact of the proposed development in these areas will be mitigated as far as possible. In order to minimise the potential for light spill, it is recommended that luminaires to be installed on the site be selected to minimise the upward spread of light near to, or above, the horizon, and that luminaire controllers be employed to reduce spill light and glare. Other recommendations included within the Lighting Impact Assessment to ensure a reduced impact with respect to light pollution include:

- Lighting should be provided in the form of column mounted lanterns which, where possible, should be pointed into the development and away from the adjacent sites. It is recommended that the optics in the lanterns control the distribution of light avoiding overspill, sky glow and glare.
- Glare should be kept to a minimum by ensuring the main beam angle of luminaires directed towards any potential observer is kept below 70°. Higher mounting heights should be included for to allow for the provision of lower beam angles, which would assist in reducing glare.
- Use of narrow spectrum light sources to lower the range of bat and nocturnal fauna species affected by lighting.
- Use of light sources that emit minimal ultra-violet light.

- Avoidance of white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are installed in order to manage the blue short wavelength content they will be of a warm / neutral colour temperature >4,200 kelvin.

#### **Water Pollution**

4.55 The implementation of the proposed surface water drainage network will include appropriate pollution control measures to minimise the risk of pollution entering the ground and surface water bodies from surface water runoff from the development. An appropriate SuDS treatment train has been incorporated within the design to treat surface water before it is discharged.

4.56 Additional measures will also be adopted during construction to minimise the risk of ground and surface water pollution, including:

- Oil separators;
- Clear marking and signage of drainage stems;
- Full bunding of on-site fuel or oil delivery areas;
- Bunding of areas to be used for cleaning activities; and
- Best practice measures, implemented as part of a Construction Environmental Management Plan (CEMP), to mitigate the impacts of construction-related dust and emissions.

## 5. ENERGY STRATEGY

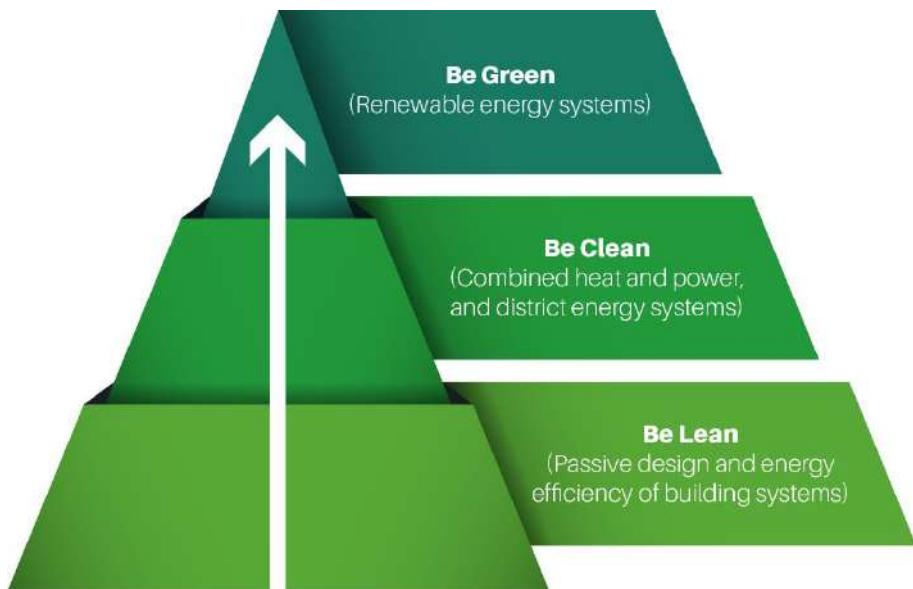
- 5.1 With reference to the policy requirements, guidance and industry best practice detailed in Section 3, a comprehensive energy and carbon dioxide (CO<sub>2</sub>) emissions assessment has been carried out for the proposed development. The energy performance of the scheme has been analysed and evaluated against the most up-to-date iteration of Part L of the Building Regulations and pertinent Lewes District Council and Mid Sussex District policies.
- 5.2 In order to maintain a degree of flexibility in meeting the national standards set out in the Building Regulations on carbon and energy performance, as required by Lewes and Mid Sussex District Councils, the measures outlined below describe a potential means of achieving a reduction in CO<sub>2</sub> emissions over the Part L:2021 baseline. Therefore, the final building specification may be subject to change during detailed design, although the overall principles proposed below will be retained to deliver low carbon buildings in operation.

### **The Energy Hierarchy**

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- 5.3 The proposed strategy is based upon the principles of the Energy Hierarchy on the basis that it is preferable to reduce carbon dioxide emissions through reduced energy consumption above decarbonisation through alternative energy sources.
- 5.4 The tiers of the Energy Hierarchy are:
  - Be Lean Use less energy
  - Be Clean Supply energy efficiently
  - Be Green Use renewable energy

Figure 5.1 The Energy Hierarchy



#### **'Be Lean' (Use Less Energy)**

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- 5.5 Within the first stage of the energy hierarchy, it is proposed to incorporate high levels of passive and energy efficient design measures in order to reduce the development's energy consumption and associated CO<sub>2</sub> emissions, utilising a 'fabric first' approach to reduce energy demand.
- 5.6 Details of the passive design and indicative energy efficiency measures proposed have been detailed below.
- 5.7 Passive design utilises daylight, solar energy, shading and stack or wind driven ventilation to illuminate, heat, shade where necessary and ventilate/cool the building, thus requiring less (mechanical) energy to achieve the performance standards for health and wellbeing of the residents.
- 5.8 Site characteristics relating to local climate, surroundings, scale and size of the development therefore passively influence the potential energy requirement and savings that can be achieved through the consideration of these aspects. The parameters that most influence the potential to utilise sunlight and solar gains are the orientation and layout of buildings, however these are typically driven by various factors other than energy efficiency or bioclimatic design considerations (e.g. aesthetics, function, etc.).
- 5.9 As shown in Figure 2.1 above, the orientation of the buildings will be dictated by the plot orientation in order to give the overall scheme a cohesive design approach. The distances between buildings will be optimised to ensure sufficient access to natural daylight and passive solar gains to the buildings. Light and solar gain will also be influenced by the fenestration and the selection of glazing with a high degree of light transmittance.

5.10 The following U-values are proposed as a means of limiting heat loss through the building fabric.

**Table 5.1 Proposed building fabric U-values**

<b>Building Fabric Element</b>	<b>Part L1:2021 backstop U-values (W/m<sup>2</sup>K)</b>	<b>Proposed U-values (W/m<sup>2</sup>K)</b>
Ground floor	0.18	0.10
External wall	0.26	0.15
Roof	0.16	0.10
Windows	1.60 (including frame)	1.40 (including frame)
Doors	1.60	1.00

5.11 It is expected that glazing will be double glazed, with a low emissivity coating. Although this has yet to be formally specified, it is anticipated that thermally efficient glazing will be employed, with window U-values of 1.40 W/m<sup>2</sup>K or better (including frame), a g-value of 0.63 and light transmission of ~70% to improve natural daylight penetration.

5.12 A high level of air tightness is proposed, where a level equal to or below 5 m<sup>3</sup>/h/m<sup>2</sup> shall be targeted, meaning that air infiltration between the internal and the external environment will be largely controlled, and space heating/cooling demand further reduced.

5.13 The other significant means of heat loss from dwellings is due to thermal (or cold) bridging. This is typically a construction detail which has higher thermal conductivity than the surrounding materials, creating a path of least resistance for heat transfer. Thermal bridges result in an overall reduction in thermal resistance of the building elements and should be designed out where possible to minimise unwanted heat loss. In order to minimise heat loss through thermal bridges it is intended that an equivalent y-value of no more than 0.05 W/m<sup>2</sup>K will be targeted for each dwelling.

5.14 High efficiency plant, equipment and controls are proposed to limit the energy consumed in order to provide the required level of indoor environmental performance and control. Performance efficiency values have been specified in line with the requirements of the Building Regulations in order to minimise carbon dioxide emissions as far as possible through the 'Be Lean' stage.

- Low energy LED lighting will be installed throughout the proposed development, including daylight dimming and presence detection controls where appropriate.

- In order to remove the need for fossil fuel combustion on-site, it is recommended that space and water heating, in addition to space cooling where required, will be provided by air source heat pump (ASHP) systems. This is addressed in more detail in the renewable and low carbon energy technology section below.
- All residential units will be provided with opening windows to enable a natural ventilation strategy that utilises cross ventilation where feasible to provide fresh air to habitable spaces, without increasing the risk of overheating. However, where necessary, passive through-wall ventilators will be considered to provide fresh air to dwellings where openable windows cannot be relied on due to noise constraints.
- It is recommended that the non-domestic building be naturally ventilated during the summer months, with outside air provided via mechanical ventilation with heat recovery (MVHR) during the winter. It is recommended that, where provided, MVHR systems with a specific fan power (SFP) of 1.1 W/l/s and heat exchanger efficiency of 70% be employed. Toilets should be provided with extract ventilation only, using fans with a specific fan power not greater than 0.3 W/l/s.
- Whilst the cooling demands of the non-domestic building will be reduced as far as possible, through the prioritisation of passive means of cooling, it may be necessary in some instances to employ active cooling within some spaces. Where cooling is required, it is recommended that this be provided using a variable refrigerant flow (VRF) system with a seasonal energy efficiency ratio of no less than 5.0.
- Energy management systems, such as smart meters, will be installed in all dwellings to enable future residents to monitor their energy usage, and therefore aid in reducing their energy consumption. Similarly, energy usage within the non-domestic building should be separately sub-metered to ensure that energy usage can be appropriately measured and managed, based on the end use category.
- All future residents will be provided with a Home User Guide, to ensure all plant and equipment provided is used correctly and to enable efficiency of use to be maximised.
- Time and temperature zones will be employed in all dwellings and will be controlled by the suitable arrangement of plumbing and electrical systems.
- For the non-domestic building, it is recommended that variable speed pumps be employed to modulate flow rates as required by demand. In addition, and where relevant, the electricity power factor should be greater than 0.95, and light metering with warnings about out of range values will be utilised as part of the building management system.

## **'Be Clean' (Supply Energy Efficiently)**

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5.15 The potential for the proposed development to incorporate a low carbon heating system has been reviewed for the scheme.

5.16 Local heat and power sources minimise distribution losses and achieve greater efficiencies when compared to a separate energy system. This in turn reduces the site-wide energy consumption and associated carbon dioxide emissions.

5.17 The potential integration of a district heating network (DHN) or a conventional gas-fired combined heat and power (CHP) plant to provide low carbon heat and power on-site has been evaluated for the development, in compliance with industry best practice and appropriate planning policies.

### **District Heating Feasibility**

5.18 The feasibility of a DHN is heavily dependent on a location's heat demand. In turn, heat demand in the locality is dependent on building usage and the surrounding area heat demand density. The establishment of a new DHN is capital intensive and, to ensure economic viability, requires areas of high thermal demand density in order to minimise losses and associated costs. A threshold thermal density value of 50 kWh/m<sup>2</sup> is typically required to ensure viability, as is a location in proximity to an anchor heat load, such as a hospital.

5.19 Figure 5.2 below displays the development site within its proposed surroundings. From this, it can be concluded that the site itself is undeveloped, with relatively low-density residential settlement to the northwest and north. The surrounding area is therefore likely to be characterised by a low heat demand, and it is considered that no anchor heat load is present within the surroundings of the site.

**Figure 5.2 Site and surroundings**

 Approximate site boundary



5.20 There are no existing or proposed district heating networks within close proximity to the site. In addition, due to the relatively low density of the development, and the cost of the infrastructure required to connect a peri-urban location to a district heat network, it is not deemed cost effective to establish a district heat network on the site as part of the proposed development.

5.21 The proposed development will deliver buildings that are designed to comply with the most up to date iteration of the Building Regulations and the Future Homes Standard, which will reduce the energy demand of the buildings. It is anticipated, therefore, that the thermal demand density of the proposed development will be far less than the threshold value stated above. Further to this, densities well in excess of 100 dwellings per hectare are typically required at a minimum to ensure the efficient operation of a DHN. As demonstrated in Figure 2.1 above, the proposed development will not seek to deliver the densities required to support the efficient operation of a DHN.

5.22 Therefore, based on the low density of the proposed development, and the costs associated with the establishment of a DHN in a peri-urban location, in combination with the fact that there are no existing or proposed DHNs within close proximity to the site, it is not considered to be feasible to incorporate a DHN as part of the proposed development.

#### **Combined Heat and Power Feasibility**

5.23 Based on the anticipated timescale of the proposed development and the predicted trajectory of the national electricity grid decarbonisation, the establishment of a CHP network powered by fossil fuels is not considered to be a carbon efficient approach.

5.24 It is considered that projected changes to the carbon content of electricity and gas will result in technologies that have lower operational emissions than CHP, and which are able to optimise local energy sources, being the preferred option for serving the heating demands of the built environment. These technologies are likely to be able to offset more carbon emissions than traditional, gas-engine CHP systems.

5.25 The incorporation of a gas-fired CHP network will lock the development into relatively carbon intensive gas-fired heating and hot water technology, and will not facilitate the transition to less carbon intensive solutions.

#### **'Be Green' (Utilise Renewable and Low Carbon Technologies)**

5.26 The proposed development has given consideration to renewable and low carbon energy technologies that may be applicable to deliver the required level of carbon dioxide savings over the Part L:2021 baseline, and the likely local effects on the environment.

5.27 In determining the appropriate renewable and low carbon energy technology for the site, a number of factors including carbon dioxide savings, site constraints, and potential visual impacts have been considered. Further details of each technology and its associated assessment in relation to the development are provided below.

- **Biomass** – This technology is not considered a practical solution for reducing carbon dioxide emissions, in the view of storage space requirements for combustible material, and the transport related carbon emissions which are not normally accounted for within energy modelling. Furthermore, high nitrous oxide (NO<sub>x</sub>) and particulate matter (PM<sub>x</sub>) emissions are associated with the use of biomass fuel, and as the proposed development is located within proximity to existing, and will introduce new, residential dwellings and a care home, the permitted emissions will be restricted. It is noted that alternative technologies, such as ceramic filters or bag filters, have the potential to significantly reduce the emissions associated with biomass fuels, and this may therefore be explored as the design of the proposed development continues to progress.
- **Air Source Heat Pumps (ASHP)** – Given the site location and the lack of local existing or proposed heat networks, the use of air source heat pump (ASHP) technology is considered appropriate to serve the space and water heating demands of the proposed dwellings and non-domestic building, in addition to the cooling demands of the proposed non-domestic building where this is required. ASHPs do not produce emissions at the point of use, and do not impact on air quality within their locality. This technology is therefore considered appropriate for the proposed development, and should the intention be to incorporate ASHPs, details of their integration would be provided as part of a Reserved Matters Application. It is noted that, should this type of system be employed to deliver space heating, low temperature systems, such as underfloor heating or low temperature radiators, would be recommended. Furthermore, should this technology be incorporated within the proposed development, it is recommended that acoustic measures to limit the noise generated by the outside unit of any ASHP systems employed during operation are considered.
- **Ground Source Heat Pumps (GSHP)** – As detailed above for air source heat pump (ASHP) technology, the location of the site means that the incorporation of ground source heat pump (GSHP) technology may also be appropriate to serve the space and water heating, and cooling where relevant, demands of the proposed development. Ground temperatures are typically stable throughout the year, and GSHPs are therefore able to provide a consistent level of performance throughout the year. It is highlighted, however, that there are uncertainties concerning the thermal properties of the ground, and that ground investigation and borehole drilling has the potential to be cost prohibitive, with the potential that a suitable energy source is not present. Furthermore, there is potential that the carbon dioxide and energy cost savings arising from the use of GSHP systems may not be significant when compared to that of ASHP systems, particularly as high-grade heat is required to generate domestic hot water. It is also noted that GSHP systems are typically around twice as expensive as ASHP technology, which may therefore make the use of this technology economically unviable. Notwithstanding, the use

of GSHP technology is potentially appropriate and feasible within the proposed development, and the potential use of systems of this type will continue to be considered as the detailed design of the proposed development progresses.

- **Photovoltaics (PV)** – This technology is considered to be appropriate for the proposed development, in light of the potential to deliver a proposed layout that includes for dwellings and non-domestic building with areas of unobstructed south-east to south-west facing roof space. This technology may therefore be employed to generate renewable energy on-site, with the potential for excess power to be exported to the grid or harnessed using battery storage. The use of this technology, which typically has minimal maintenance requirements, should therefore be considered during the detailed design stage to contribute to the proposed development's compliance with Part L:2021 of the Building Regulations and the Future Homes and Future Buildings Standards. As such, it is recommended that the incorporation of PV technology continues to be explored through the detailed design stage and, should this technology be incorporated, details of the PV systems to be employed be provided as part of a Reserved Matters application.
- **Solar Thermal Hot Water (STHW)** – This technology may also be considered appropriate for the proposed development, in light of the potential to deliver dwellings and non-domestic building with areas of unobstructed southeast to south-west facing roof space. The incorporation of this technology can contribute to the meeting of a building's domestic hot water demand, and this technology can be employed effectively alongside a range of heating systems. It is noted that the incorporation of this technology would need to account for the requirements of other technologies that may be employed, such as heat pump or PV systems. In addition to this, the potential for hot water demand to fall outside the energy generating period for STHW systems should be accounted for, as this may result in a reduced ability for this technology to significantly reduce carbon dioxide emissions during operation. The potential incorporation of this technology within the proposed development will continue to be explored throughout the detailed design stage, and should this technology be included for, details of the systems will be provided as part of a Reserved Matters Application.
- **Wind Turbines** – Wind turbines may be employed to harness the kinetic energy of wind to generate electricity on-site. The employment of this technology should account for the need for a steady source of wind that does not have an uneven direction. This technology is typically incorporated at the roof level of buildings that are significantly higher than their immediate surroundings, or within an open area, to ensure disruption to prevailing winds is minimised. When accounting for the nature of the proposed development and the area within which it is situated, it is considered that the incorporation of this technology is inappropriate.

5.28 Based on the information set out above, it is recommended that air source heat pump (ASHP) systems and rooftop photovoltaic (PV) panels be employed to serve the space and water heating demands of the proposed dwellings and non-domestic building, as well as the cooling demands of

the non-domestic building where relevant, and to generate carbon free electricity on-site. The incorporation of these technologies will aid the achievement of a significant reduction of carbon emissions in operation when compared to the Part L:2021 of the Building Regulations baseline, which is in line with the aspirations of the proposed scheme, as well as the requirements of both the adopted Lewes District Council Local Plan and the adopted Mid Sussex District Plan 2014 – 2031, and the preferred policy options set out within the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation) and the draft policies set out in the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications).

## 6. SUMMARY

6.1 This Sustainability & Energy Statement provides an overview as to how the development of the Land east of Lunce's Hill, Haywards Heath contributes to sustainable development in the context of the strategic, design and construction considerations.

6.2 Consideration has been given to Chapter 14 of the National Planning Policy Framework (NPPF), the Lewes District Council Local Plan Part 1: Joint Core Strategy 2010 – 2030, the Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies, the Lewes District Council Renewable Energy and Energy Efficiency Supplementary Planning Document, the Lewes District Council Planning Technical Advice Note: Sustainability in Development, the Lewes District Council Planning Technical Advice Note: Circular Economy, the Wivelsfield Parish Neighbourhood Plan 2015 – 2030, the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation), the Mid Sussex District Plan 2014 – 2031, the Mid Sussex Design Guide Supplementary Planning Document, the Haywards Heath Town Council Neighbourhood Plan 2014 – 2031, and the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications) in the formulation of this strategy, aiming to minimise the environmental impact of the proposed development during construction and operation, and ensure the development is constructed to rigorous sustainability standards.

6.3 By designing to rigorous energy standards, employing electric-only systems, and integrating renewable and low carbon energy technologies, the application will respond directly to the Climate Emergency declared by Lewes District Council in July 2019, and the Climate and Sustainability Action set out by Mid Sussex District Council. These measures combine to facilitate significant carbon dioxide emissions savings compared to the Part L:2021 baseline, aiming to significantly exceed the requirements set out within the adopted Lewes District Council Local Plan and the Mid Sussex District Plan 2014 – 2031, and in alignment with the direction of the preferred policy options set out within the Lewes District Council Towards a Local Plan Spatial Strategy and Policy Directions (Regulation 18 Consultation) and the draft policies set out in the Mid Sussex District Plan 2021 – 2039 (Regulation 19; with Main Modifications).

6.4 Sections 4 and 5 of this statement demonstrate that the siting and design of the proposals support relevant policies relating to sustainable development. This shows that the proposed development:

- make efficient use of land;
- promote the use of sustainable and active modes of transport;
- reduce the risk of flooding on-site and in the surrounding area;
- minimise internal water consumption to 105 litres per person per day;

- incorporate low-impact materials, according to the BRE Green Guide to Specification;
- minimise waste production during construction and maximise the proportion of waste to be diverted from landfill;
- mitigate the risk of overheating;
- incorporate measures to improve site biodiversity, including biodiverse planting;
- ensure air, noise, ground, light and water pollution are minimised as far as possible;
- minimise energy demand through the specification of low U-values, low air permeability and low thermal bridging to reduce heat loss;
- be fossil fuel free, utilising electric-only systems, such as air source heat pumps (ASHPs) to serve the space and water heating demands of the proposed buildings;
- utilise renewable technology, such as rooftop photovoltaic panels, to provide renewable electricity; and
- achieve a significant reduction in CO<sub>2</sub> emissions for the proposed buildings, following the Energy Hierarchy methodology.

6.5 Overall, the proposals for the scheme are in line with the principles of sustainable development as well as the policy requirements of the NPPF, Lewes District Council and Mid Sussex Council, and will provide a development that promotes these principles in operation.

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## A1. SITE PLAN



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## A2. WATER USAGE CALCULATOR



Job no:	1000318
Date:	06/12/2024
Assessor name:	
Registration no:	N/A
Development name:	Land at Lunce's Hill

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### WATER EFFICIENCY CALCULATOR FOR NEW DWELLINGS - (BASIC CALCULATOR)

	House Type:	Type 1		Type 2		Type 3		Type 4		Type 5		Type 6		Type 7		Type 8		Type 9		Type 10	
		Description:	Typical Unit																		
Installation Type	Unit of measure	Capacity/flow rate	Litres/person/day																		
Is a dual or single flush WC specified?		Dual	Select option:	Select option:	Select option:	Click to Select	Click to Select	Click to Select	Click to Select	Click to Select	Click to Select										
WC	Full flush volume	6	8.76		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
	Part flush volume	3	8.88		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Taps (excluding kitchen and external taps)	Flow rate (litres / minute)	3	6.32		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Are both a Bath & Shower Present?		Bath & Shower	Select option:	Select option:	Select option:																
Bath	Capacity to overflow	180	19.80		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Shower	Flow rate (litres / minute)	8	34.96		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Kitchen sink taps	Flow rate (litres / minute)	4	12.12		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Has a washing machine been specified?		No	Select option:	Select option:	Select option:																
Washing Machine	Litres / kg	18	17.16		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Has a dishwasher been specified?		No	Select option:	Select option:	Select option:																
Dishwasher	Litres / place setting	4.5	4.50		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Has a waste disposal unit been specified?		No	0.00	Select option:	0.00																
Water Softener	Litres / person / day		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00
Calculated Use		112.5		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
Normalisation factor		0.91		0.91		0.91		0.91		0.91		0.91		0.91		0.91		0.91		0.91	
Total Consumption		102.4		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
Mandatory level		Level 3/4		-		-		-		-		-		-		-		-		-	
Building Regulations 17.K	External use	5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0	
	Total Consumption	107.4		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
	17.K Compliance?	Yes		-		-		-		-		-		-		-		-		-	

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### **A3. GENERAL NOTES**

- A3.1 The report is based on information available at the time of the writing and discussions with the client during any project meetings. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Iceni Projects Ltd for inaccuracies in the data supplied by any other party.
- A3.2 The review of planning policy and other requirements does not constitute a detailed review. Its purpose is as a guide to provide the context for the development and to determine the likely requirements of the Local Authority.
- A3.3 No site visits have been carried out, unless otherwise specified.
- A3.4 This report is prepared and written in the context of an agreed scope of work and should not be used in a different context. Furthermore, new information, improved practices and changes in guidance may necessitate a re-interpretation of the report in whole or in part after its original submission.
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