APPENDIX 3.1
ENERGY, WASTE AND SUSTAINABILITY STATEMENT

DAEDALUS ENVIRONMENTAL

Land at Downlands Farm, Uckfield
East Sussex

Energy, Waste & Sustainability Statement

May 2022

Key Features of the Proposals

Highly energy efficient, climate adaptable, sympathetically designed homes

40%
estimated reduction in regulated carbon emissions against Building Regulations 2013 standards through a combination of thermal efficiency and low carbon energy systems

ZERO
fossil fuel use within the development

20%
estimated reduction in average annual energy bills for households

A secure and identified trajectory to net zero emissions over time

100%
of properties with on-plot parking to have a dedicated EV charging point

25%
reduction in potable water use against the national average

Construction waste will be dramatically reduced, with a focus on sustainable procurement, re-use and recycling

100%
of properties to have secure and weatherproof cycle storage

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1 Introduction

1.1 This Statement

1.1.1 This *Energy, Waste & Sustainability Statement* supports the hybrid planning application for the proposed development on land at Downlands Farm, Uckfield in the Wealden district of East Sussex. It has been commissioned by Gleeson Land (the Applicant) to demonstrate how the development proposals address sustainability, with a focus on energy and waste management.

1.1.2 The policy framework encouraging sustainable new development is comprehensive at both a national and local level. This Statement responds to existing planning policy, including the Wealden District Core Strategy Local Plan (2013) and the saved policies of the Wealden Local Plan (1998), while also looking ahead to the imminent changes to the Building Regulations and the proposed Future Homes Standard.

1.1.3 Furthermore, Wealden District Council has declared a Climate Emergency and has committed to working towards achieving net-zero carbon emissions by 2050. This Statement describes the holistic approach to energy efficiency and low carbon energy proposed for this development which aligns with these aspirations.

1.1.4 In line with the requirements of Wealden District's Planning Validation Guide (January 2021), this document includes:

- Energy Statement
  - Energy efficient design
  - Energy demand
  - Low carbon energy supply
- Waste Minimisation Statement
  - Sustainable procurement
  - Construction waste management
  - Operational waste management

1.1.5 In addition, it includes summaries of other sustainability considerations and features of the site, drawing on the work of other consultants where necessary, including:

- Climate resilience and adaptation
- Water efficiency
- Accessibility, sustainable transport and connectivity

1.1.6 The recommendations provided are described in as much detail as is possible at this outline planning stage. Where specifics are not available, the overall approach and design standards have been laid out to ensure that the sustainable quality of construction remains high throughout the lifetime of the development.

1.2 Description of Development

1.2.1 The application is a Hybrid Planning Application with the following description:

Hybrid Planning Application comprising:

(1) Outline Application (with all matters reserved except for access) for the erection of up to 424 residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield Bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks.

(2) Full Application comprising creation of a Strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from Rocks Road, associated landscaping, infrastructure and earthworks.

1.3 Site Description

1.3.1 The proposed c.46-hectare site is located on land at Downlands Farm, on the north-western edge of Uckfield town. It comprises a mixture of woodland (including Ancient and Semi-Natural Woodland) and agricultural land. The site is bound by the A22 to the north-west, Snatts Road and residential dwellings to the south-east, Lakewood to the south-west and Budletts Wood to the north-east.

1.3.2 The images show the parameter plan and illustrative masterplan:

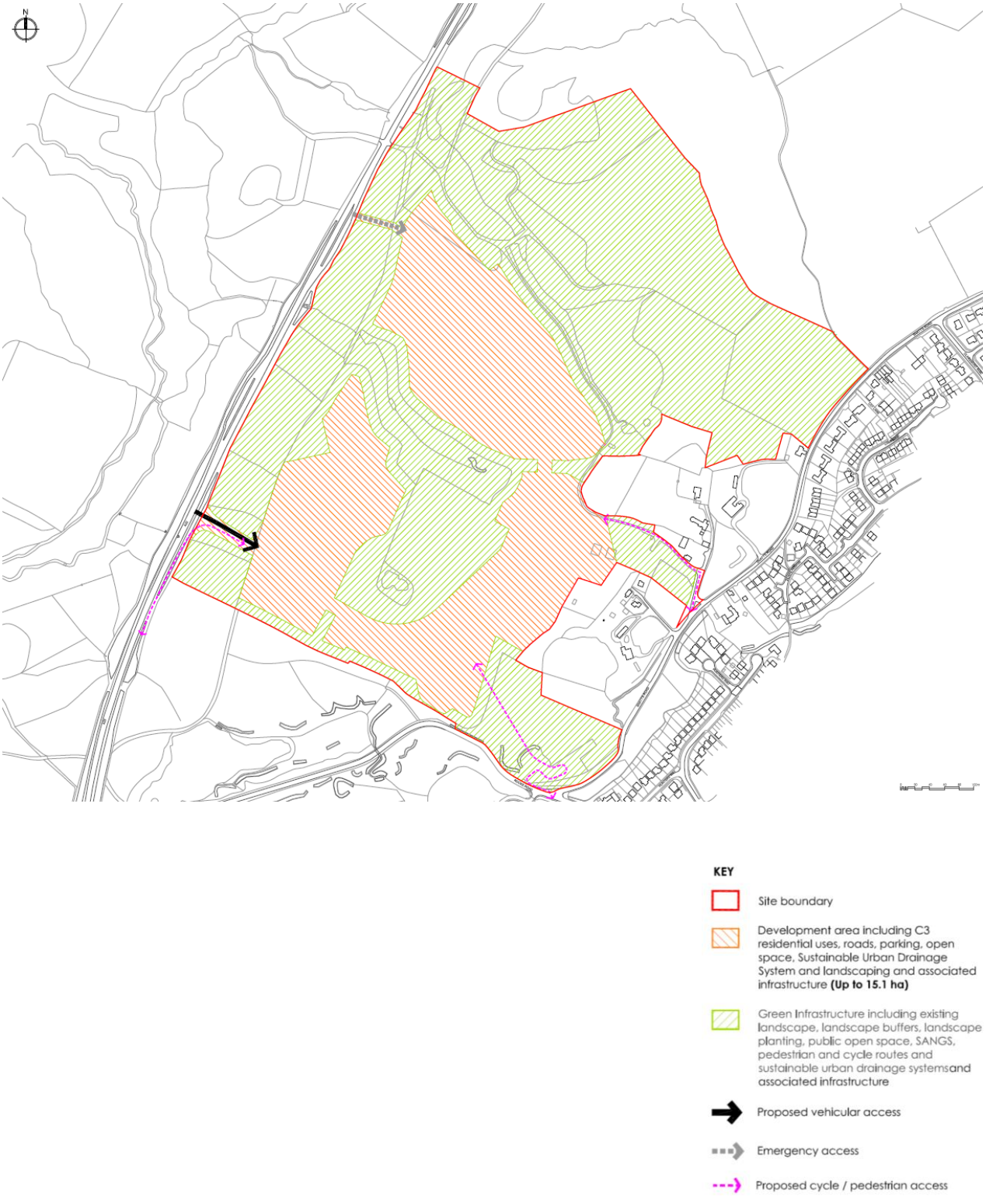


Figure 1: Parameter Plan (Richards Urban Design)



Figure 2: Illustrative Masterplan (Richards Urban Design)

2 Sustainability Policy Review

2.1 National Planning Policy

National Planning Policy Framework 2021 (NPPF)

2.1.1 The NPPF Section 2, states that the purpose of the planning system is to contribute to sustainable development, and it therefore has three overarching objectives 'to be pursued in mutually supportive ways':

- An economic role, contributing to a strong, responsive, competitive economy;
- A social role, supporting vibrant and healthy communities and;
- An environmental role, protecting and enhancing our natural, built and historic environment.

2.1.2 As such, the NPPF at its heart contains a 'presumption in favour of sustainable development'. Emphasising the need to achieve well designed places, the NPPF states that "*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*".

2.1.3 The NPPF sets out a number of principles which should underpin both plan-making and decision-taking, and of which many are particularly relevant to this document. In this context, planning should:

- Promote healthy and inclusive places that encourage social interaction, enhance healthy lifestyles, and which are safe and accessible;
- Seek to secure a high-quality of design and a good standard of amenity for occupants;
- Support the transition to a low-carbon future, avoid increased vulnerability to climate change impacts, take account of flood risk and coastal change and seek to reduce greenhouse gas emissions. Plans should include a positive strategy for dealing with more sustainable forms of energy and, in particular, renewable sources;
- Help conserve and enhance the natural environment, achieve net gains in biodiversity and reduce the impact of all forms of pollution;
- Plan and manage development to make full use of public transport, walking and cycling; and take into account the emerging changes in, and requirements of, the transport industry around electric vehicles and other ultra low emission vehicles;
- Support the expansion of high quality communications networks which are seen as integral to economic growth and wellbeing (for example the application of full fibre connections to the building).

National Energy Policy

2.1.4 The Climate Change Act 2008 is the basis for the UK's approach for tackling and responding to climate change. It originally set a binding target to reduce the UK's carbon emissions by at least 80% by 2050 from 1990 levels. In June 2019, this target was replaced with achieving net zero emissions by 2050.

2.1.5 *Part L: Conservation of Fuel and Power* and *Part F: Ventilation* of the Building Regulations lay out the current standards for energy efficiency and ventilation in new build developments. Schedule 1 of Part L specifies the following:

Requirement	*Limits on application*
Schedule 1 – Part L Conservation of fuel and power	
L1. Reasonable provision shall be made for the conservation of fuel and power in buildings by: (a) limiting heat gains and losses– (i) through thermal elements and other parts of the building fabric; and (ii) from pipes, ducts and vessels used for space heating, space cooling and hot water services; (b) providing fixed building services which– (i) are energy efficient; (ii) have effective controls; and (iii) are commissioned by testing and adjusting as necessary to ensure they use no more fuel and power than is reasonable in the circumstances.	

Figure 3: Extract from Approved Document Part L1A Building Regulations

2.1.6 These standards will apply until 15 June 2022 at which point they will be replaced with the revised Approved Document L and Approved Document F, alongside the new *Approved Document O: Overheating* (although they will not apply to work subject to a building notice, full plans application or initial notice submitted before 15 June 2022, provided the work is started on site before 15 June 2023). This Statement has been written to demonstrate how this development will comply with these updated Building Regulations.

2.1.7 As a key change, the revised Approved Document L will require dwellings to meet primary energy targets in addition to carbon and fabric efficiency targets. Tightening of fabric energy efficiency standards, air tightness and carbon performance targets will be accompanied by updated calculation requirements within the compliance mechanism (SAP10.2).

2.1.8 Approved Document F places a greater emphasis on managing ventilation to ensure that increased air tightness of dwellings does not impact internal air quality. Target air flow rates remain the same but the regulations around these have been simplified.

2.1.9 New Approved Document O has been put into place to limit overheating risk in new residential buildings. It expands on the provision in the current Part L and requires the use of passive methods where feasible. Compliance can be demonstrated through a prescriptive or thermal simulation compliance path.

2.1.10 These Building Regulation updates are designed to act as achievable 'stepping stones' to the more rigorous Future Homes Standard which will come into force in 2025. The Standard, which is currently in development, is part of the Government's strategy for achieving its 2050 target set under the updated Climate Change Act. Under the proposed new Standard, an average home will have 75 – 80% fewer carbon emissions than one built to the current Building Regulation requirements.

2.1.11 A further addition to the Building Regulations, *Approved Document S: Infrastructure for Charging Electric Vehicles (December 2021)* details new regulations for the installation of electric vehicle charging points and cable routes. It also comes into force on 15 June 2022 and will apply to new residential and non-residential buildings and to existing buildings that are undergoing major renovation. However, as with the new Part L, Part F and Part O, it will not apply to work subject to a building notice, full plans application or initial notice submitted before that date, provided the work is started on site before 15 June 2023.

2.1.12 Requirement S1 from Part S of Schedule 1 and regulation 44D of the Building Regulations states that every new home with on-site parking must have access to an EV charging point. Where no associated parking spaces are provided, there is no requirement to install an EV charging point:

Requirement

The erection of new residential buildings

S1. (1) A new residential building with associated parking must have access to electric vehicle charge points as provided for in paragraph (2).

(2) The number of associated parking spaces which have access to electric vehicle charge points must be—

(a) the total number of associated parking spaces, where there are fewer associated parking spaces than there are dwellings contained in the residential building; or

(b) the number of associated parking spaces that is equal to the total number of dwellings contained in the residential building, where there are the same number of associated parking spaces as, or more associated parking spaces than, there are dwellings.

(3) Cable routes for electric vehicle charge points must be installed in any associated parking spaces which do not, in accordance with paragraph (2), have an electric vehicle charge point where—

(a) a new residential building has more than 10 associated parking spaces; and

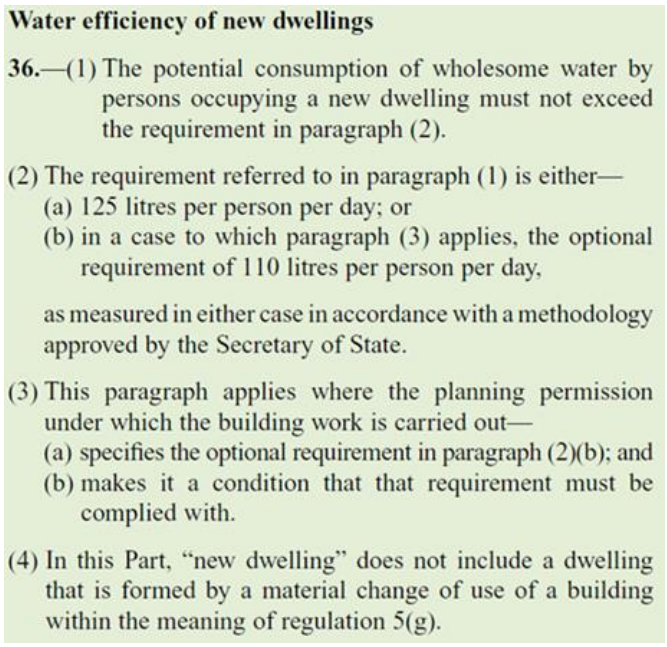
(b) there are more associated parking spaces than there are dwellings contained in the residential building.

Figure 4: Extract from Approved Document S of the Building Regulations

National Water Policy

2.1.13 Water efficiency targets are driven by Part G of the Building Regulations 2015 which pertain to sanitation, hot water safety and water efficiency.

2.1.14 Within a domestic setting, the requirement is to limit water use to either 125 litres per person per day (l/p/d) or, if required by the planning permission, an enhanced standard of 110 l/p/d.



Water efficiency of new dwellings

36.—(1) The potential consumption of wholesome water by persons occupying a new dwelling must not exceed the requirement in paragraph (2).

(2) The requirement referred to in paragraph (1) is either—
(a) 125 litres per person per day; or
(b) in a case to which paragraph (3) applies, the optional requirement of 110 litres per person per day,

as measured in either case in accordance with a methodology approved by the Secretary of State.

(3) This paragraph applies where the planning permission under which the building work is carried out—
(a) specifies the optional requirement in paragraph (2)(b); and
(b) makes it a condition that that requirement must be complied with.

(4) In this Part, "new dwelling" does not include a dwelling that is formed by a material change of use of a building within the meaning of regulation 5(g).

Figure 5: Extract from Approved Document G of the Building Regulations

National Waste Policy

2.1.15 The Waste Management Plan for England (2013) encourages the sustainable management of waste and is informed by the mandatory requirements of Article 28 of the Waste Framework Directive 2008. The Plan promotes the adoption of the Waste Hierarchy to guide effective and sustainable waste management and includes measures to ensure appropriate and sufficient construction and demolition waste management.

2.1.16 This sits alongside the National Planning Policy for Waste (2014) which sets out the government's detailed waste planning policies. The document states that local planning authorities should ensure that all new, non-waste development proposals make sufficient provision for operational waste management, promoting good design and layout to secure the integration of waste management facilities within the rest of the development. The document also requires that waste arising from the construction process is reused and recovered as far as possible to minimise offsite disposal.

2.1.17 The Waste Management Plan for England (January 2021) is an analysis of the existing waste management policies, bringing them together under one national plan.

2.2 Local Planning Policy

Wealden District Core Strategy Local Plan (February 2013)

2.2.1 This policy document sets the spatial vision and strategic objectives for Wealden district for the period 2013 to 2027. It sits alongside documents including the 'saved' policies of the Adopted Wealden Local Plan (1998) and the East Sussex County Council Waste and Minerals Local Plan to form the statutory local plan documents.

2.2.2 The Spatial Planning Objectives (SPO) and Core Delivery Policies (WCS) from the Core Strategy which are of most relevance to this Statement include:

Reference	Extract
SPO7	We will encourage reduction of the need to travel by car by concentrating development where it can most closely relate to public transport opportunities, improving the offer of our towns in terms of retail, leisure and recreation and by making it easier to travel by more sustainable modes of transport. We want to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport
SPO9	We will ensure development takes full account (by mitigation or adaptation) of the likely forecast impacts of climate change including: minimising the emissions of greenhouse gases; the use of non-renewable energy and natural resources; and by encouragement of construction using sustainable techniques
SPO13	We will encourage the development of high quality, safe and attractive living environments for communities in both towns and villages, while promoting local distinctiveness through good design in all new development. We want future built development to create spaces and places which are sustainable, distinctive and durable- places where people will want to live. These will be expected to make a real contribution to addressing climate change issues and addressing the needs of our ageing population

Adopted Wealden Local Plan (1998)

2.2.3 The following saved policies from the Wealden Local Plan 1998 are relevant to this Statement:

Policy	Extract
EN1	The Council will pursue sustainable development, having regard to the principles contained in Government guidance and its own Strategy for the Environment, in considering the location, layout and design of development, renewable energy and waste management proposals and in assessing the effects of proposals on the environment, including on water and air quality.
EN27	Proposals for development will be permitted when the following layout and design criteria are met:- (…) (3) the proposed development should ensure a satisfactory environment for the future occupants, including adequate provision for daylight, sunlight, privacy, garden space and/or appropriately landscaped amenity areas; (…)
HG7	Within housing development, consideration should be given to energy conservation in the design and layout of new housing areas, particularly with regard to the aspect of the development, the housing type proposed and the orientation of the dwellings.

Wealden Design Guide Supplementary Planning Document (2008)

2.2.4 The Wealden Design Guide is of material consideration in the determination of planning applications and this Statement demonstrates how the sustainability guidelines (section 4 of the Guide) have been considered alongside national planning policy to create a development with high design standards. Sections with particular relevance to this document include:

Reference	Extract
Section 4 2.2	The design and form of new buildings should aim to: - Minimise energy consumption by incorporating best practice measures in relation to design, internal layout and optimum solar orientation - Avoid unnecessary excavation and the transportation of inert demolition waste to landfill sites - Minimize the use of new materials which have been produced or transported unsustainably - Maximize the use of recycled materials and those from local and sustainable sources - Minimize the consumption of water by incorporating methods for its sustainable management and reuse - Protect habitats and ground water from contamination - Be flexible and capable of being adapted for changing needs and uses - Design for less car dependence
Section 4 5.2	(…) Orientatation and design should aim to : - Maximize solar gain - Maximize natural ventilation - Control heat loss - Avoid overshadowing which can significantly reduce a building's passive solar heat gain - Provide maximum daylight
Section 7 9.12	Refuse storage should be sited for easy accessibility, both for occupants and collection and be clearly identified. As a general rule, individual 'wheelie' bins and stores should : - Be inconspicuous from public view, located to avoid risk of fire damage to property or obstruction of escape routes - Be readily accessible to facilitate moving them to a kerbside location for emptying - Be directly accessible to collection vehicles If in the form of communal bins - Be lockable with an integral door lock as opposed to a padlock - Not be located where smells would be problematic, for instance, under windows of habitable rooms - Locate wheelie bins where they can be screened from the street and neighbours by structures, buildings or planting - Not be sited so as to aid access onto or over built structures thereby reducing security

East Sussex Waste and Minerals Local Plan (2013)

2.2.5 The East Sussex Waste and Minerals Local Plan sets out the strategic policy for waste management in East Sussex including Wealden district. The sections relevant to new residential planning applications include:

Policy	Extract
WMP3a	Promoting Waste Prevention, Re-use and Waste Awareness To maximise waste prevention and re-use, the authorities will work with stakeholders and delivery partners to: a. promote strategies for waste prevention, re-use and waste awareness; b. develop more detailed action plans and policies; c. encourage developments that involve the preparation of materials for re-use. Support will be given to non-waste management developments which involve the utilisation of materials, or energy, derived from waste as a resource.
WMP3d	Minimising and Managing Waste During Construction, Demolition and Excavation When assessing development proposals, all planning authorities will consider how the applicant proposes to minimise the waste arising from construction, demolition and excavation works in order to maximise the sustainable management of waste and in particular, to minimise the need for landfill capacity. All development proposals will be expected to: a. Demonstrate how the durability of the construction has been maximised; b. minimise the waste arising from construction, demolition and excavation activities c. move the management of CDEW waste as far up the waste hierarchy as practicable; d. take account of relevant legislation, the guidance within the Construction & Demolition Waste SPD (including any subsequent updates); and e. demonstrate how they will monitor progress within the lifetime of the construction phase of the development. Temporary waste facilities on construction sites: Major construction sites or development areas (such as housing developments) should provide temporary waste management facilities to separate and where appropriate recycle Construction, Demolition and Excavation Waste. Where space on site allows, development should be phased to encourage re-use of recycled material and also to minimise the transport of waste materials from the site and the import of new materials. Temporary screening banks may be needed around any onsite processing facility to minimise the impacts on adjoining areas and on completed parts of the development. Where these are to be retained as permanent features they must be designed to conserve and enhance local landscape character.
WMP3e	Waste Management in New Development Proposals for new developments (housing, retail, commercial and industrial uses) should identify the location and provision of facilities and infrastructure intended to allow for the efficient management of waste within the overall site plan. This includes provision for waste collection and separation (including communal facilities), and for allowing proper manoeuvring of waste collection vehicles. All new development proposals should facilitate the convenient separation and collection of household and business waste, as appropriate; as well as ensuring ease of access for waste collection.

East Sussex Construction and Demolition Waste Supplementary Planning Document (2005)

2.2.6 This SPD provides guidance on construction and demolition waste management and applies to all developments of five or more housing units. This Statement includes a Waste Minimisation Statement which has been written with due regard to the SPD as well as national and local policy.

East Sussex Guidance for Parking at New Residential Development (2017)

2.2.7 The East Sussex Guidance encourages developers to include charging facilities for electric vehicles at all properties with off street parking and states that charging points for other parking areas should also be considered.

Additional Planning Policy Documents

2.2.8 Further guidance exists relating to transport, parking, flood risk and ecology. These are covered in more detail in the other reports accompanying this submission. This Statement does however refer to the outputs of these reports where relevant to give a rounded picture of the approach to sustainable design and construction issues.

3 Energy Statement

3.1 Introduction

3.1.1 This Energy Statement describes how the development will balance solar gain against overheating risk, explains the approach to minimising energy demand through efficient construction detailing and outlines how the development will take a low carbon approach to energy supply.

3.1.2 The hierarchy of solutions proposed will ensure that the development will meet the requirements of the emerging Building Regulations.

3.1.3 Furthermore, it will set the development on a path to net zero emissions over time in line with the Council's Climate Emergency ambitions: installing heat pump technology for space heating plus the vast majority of domestic hot water means the homes will be using Grid electricity, which is considerably cleaner per unit than natural gas, and will continue to decarbonise over time.

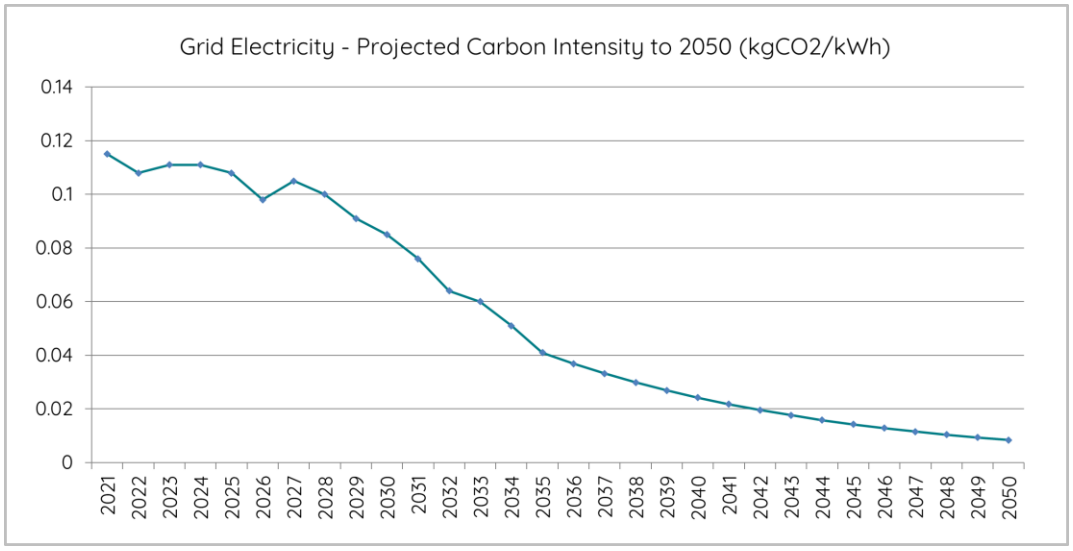


Figure 6: Projected Grid Decarbonisation

3.2 The Energy Hierarchy

3.2.1 The Energy Hierarchy underpins the entire approach to building performance for this development, thus prioritising a reduction in the demand for energy as far as possible through thermally efficient, easily controlled, well designed and orientated buildings.

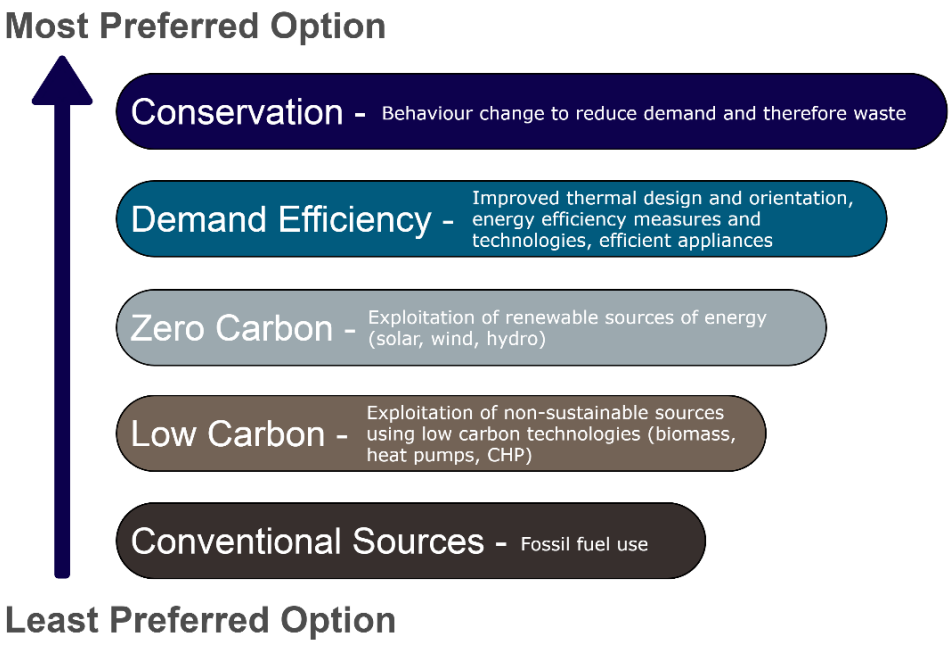


Figure 7: The Energy Hierarchy

3.3 Site Layout - Orientation, Sunlight and Daylighting

3.3.1 Wealden Local Plan 1998 saved policy EN27 and Wealden Design Guide SPD section 4 recognise that the orientation of properties and the size and location of glazing plays an important part in energy performance. Improving a building's orientation so that the main living spaces can benefit from the heat and light of the Sun can reduce the requirement to use fossil fuels to perform the same function. This reduces costs, energy use and associated carbon emissions.

3.3.2 Ideally a building should have a southerly orientation, so it can benefit from the Sun during the middle portion of the day without suffering from potential overheating later in the afternoon. This also helps to ensure that during the winter, when the Sun's path is shortened, the building and its living spaces still benefit as much as possible from winter sunlight.

3.3.3 However, there is a balance to be struck between maximising solar gain and the risk of overheating. Section 5 of this Statement discusses the approach to addressing and managing this risk in line with the requirements of the new Approved Document O.

3.3.4 The proposed layout of the site will be developed with respect to identified topological and visual constraints. Within these parameters, many of the properties will benefit from a southerly orientation. Furthermore, the low / medium density of the development will ensure appropriate spaces around dwellings, reducing overshadowing.

3.4 Energy Efficient Building Envelope

Thermal Elements

3.4.1 The buildings will be energy efficient structurally to meet both national and local requirements. To facilitate this, the individual elements (wall, roof, and floor) be thermally efficient, and the construction will ensure that thermal bridges are minimised through the application of Accredited Construction Details (or their subsequent replacement in bespoke detailing), including insulated lintels, and by ensuring air tightness.

3.4.2 Indicative u-values for different thermal elements are given in Table 1 in section 3.7.

Ventilation and Air Tightness

3.4.3 The air tightness of a building is important in reducing heat loss and the prevention of draughts. The target for the development will be to ensure domestic properties are built with an air permeability level of $5m^3/m^2$@50Pa or less. This will help reduce the size of the required heating system thus reducing energy use and carbon emissions. Other benefits include the reduction in the risk of interstitial condensation, improving the building's lifespan and reducing sound transmission through the structure.

3.4.4 The drive for air tightness will need to be matched by correctly designed ventilation. This is vital for healthy, comfortable buildings as it removes or dilutes pollutants that can accumulate in a closed space. Excessive moisture in particular can otherwise be a significant problem.

3.4.5 It is the intention that this development will benefit from natural ventilation through the use of cross ventilation and openable windows. This will enable rapid purges of air and good levels of internal air quality. There may also be the need to implement a high efficiency continuous mechanical extract system to ensure that ventilation does not become an issue, with particular focus on mechanical extract ventilation from bathrooms and kitchens.

3.5 Low Carbon Energy Supply

3.5.1 The Applicant has committed to ensuring that there will be no fossil fuels burned on this development and is investigating the installation of air source heat pumps (ASHPs) for space and water heating in all properties.

3.5.2 By installing heat pumps – a recognised low carbon technology - the Applicant will be addressing the application of low carbon / renewable technologies within the development.

3.5.3 The heat pump solution will also futureproof the dwellings, enabling them to benefit from Grid decarbonisation over time and effectively resulting in fewer emissions year on year: the rapid expansion in renewable and low carbon energy supply within the Grid in recent years means that even direct electric heating now emits less carbon per kWh than natural gas. This option therefore aligns closely with the nationwide approach to the low carbon energy transition and Wealden District's carbon neutrality aspirations.

3.5.4 If, in the future and prior to construction, other alternative and non-fossil fuel driven solutions become an option, then the heat pump solution may be substituted, whilst ensuring the carbon performance of the dwellings is not compromised.

3.6 Lighting, Fixtures and Fittings

3.6.1 Further energy savings will be made by maximising the efficiency of appliances, lighting, fixtures and fittings.

3.6.2 All electric lighting will be energy efficient, and any spot lighting will be provided using dedicated LED fittings. All appliances where installed will be high efficiency, further minimising the use of both electricity and hot water. Moreover, where these are not installed, they will be provided to incoming residents within the list of optional extras.

3.6.3 Taps and shower fixtures and fittings that reduce hot water consumption with low and/or aerated flows will be specified; more detail in relation to potable water management is provided in section 6.

3.6.4 In addition to the internal lighting, all external street lighting where provided will be high efficiency to further minimise lifetime energy use and associated emissions.

3.6.5 A further option that will be explored is the installation of wastewater heat recovery units (WWHR) in those dwellings that can accommodate them. WWHR enables heat to be recovered from the wastewater produced in bathrooms via baths or showers. The heat recovered is used to pre-warm water to the heating system and thus reduce the amount of energy needed to provide hot water for use within the property. The impact is a further reduction in energy use and associated emissions.

3.7 Building Energy Performance

3.7.1 As this is an outline application, it has not been possible to complete detailed Building Regulations calculations to accurately identify the thermal specifications for the property types, nor provide exact data in relation to performance and associated emissions. This is something that can be done at Reserved Matters stage as the application proceeds and be secured by condition if necessary.

3.7.2 Instead, indicative performance targets for different building elements are given in Table 1 below. This has been compiled by applying the good practice specification for a dwelling built with a heat pump as described in Appendix D of the new *Approved Document L – Conservation of Fuel and Power Volume 1: Dwellings (December 2021)*.

Element Type	Limiting U-Values for New Fabric Elements and Air Permeability in New Dwellings		Indicative Target U-Value for Proposed Development (W/m^2K)
	Building Regulations 2013 Maximum (W/m^2K)	Building Regulations 2022 Maximum (W/m^2K)	
Roof / Sloped Roof	0.20	0.16	0.11
External walls	0.30	0.26	0.18
Party walls		0.20	0.00 (filled and sealed)
Ground floor	0.25	0.18	0.13
Glazing / doors	2.00	1.6	1.2
Factor			**Detail**
Thermal bridging	Y-value < 0.15	Y-value < 0.20 (default)	Bespoke construction details individually calculated
Air permeability	$10m^3/m^2$/hour@50Pa	$8.0m^3/m^2$/hour@50Pa	$5m^3/m^2$/hour@50Pa
Heating controls	Programmer, TRVs and room stats	Time and temperature zone control + TRVs	Time and temperature zone controls, TRVs + weather compensation

Table 1: Summary of U-values and Specifications (Indicative)

3.7.3 As shown in the table, these indicative specifications for the development exceed the limiting U-values for new fabric elements and air permeability in new dwellings within the current Building Regulations 2013. Furthermore, they also meet or exceed the emerging limiting U-values from the amended Building Regulations from June 2022.

3.7.4 The actual values to be applied to the development will be confirmed later in the planning process once detailed house types are finalised.

4 Waste Minimisation Statement

4.1 Introduction

4.1.1 This Waste Minimisation Statement sets out the approach to waste management during the design, construction and operational phases of the development. It has been produced in accordance with the requirements of national and local waste policy as outlined in section 2.

4.2 The Waste Hierarchy

4.2.1 Waste generation, storage, treatment and disposal before, during and after construction will be managed in accordance with the Waste Hierarchy, in line with the *East Sussex Waste and Minerals Local Plan* policy WMP3d:

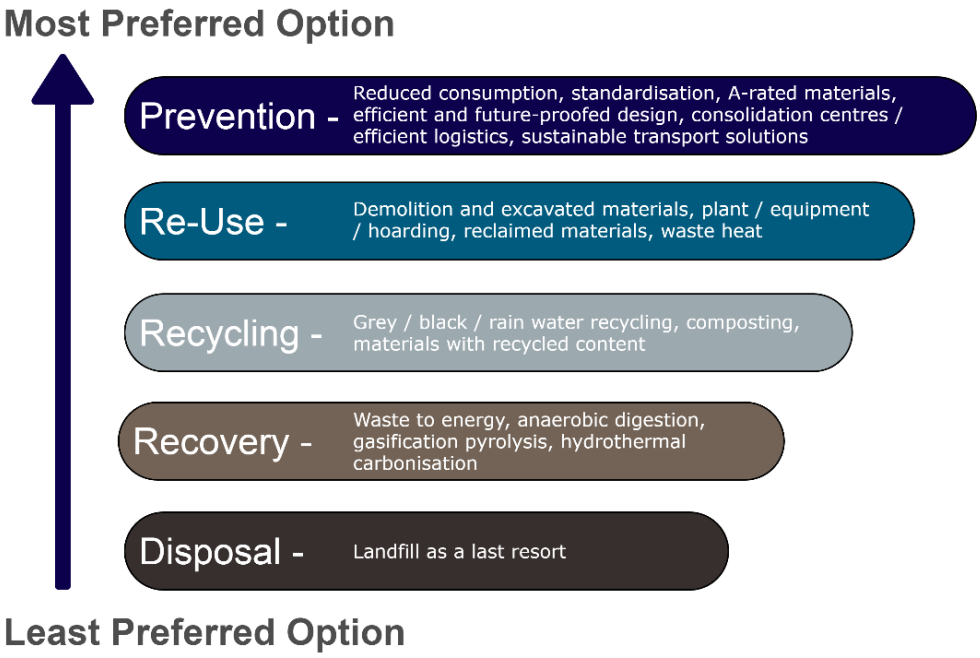


Figure 8: The Waste Hierarchy

4.3 Sustainable Procurement of Building Materials

4.3.1 The Applicant will ensure procurement throughout the development process is outcome-focused with well-defined deliverables that cover environmental, social and economic issues including resource efficiency and carbon reduction, and which provide opportunities for the local supply chain:

- Key materials will be sourced using suppliers with recognised environmentally focused accreditations and management systems such as ISO:14001;
- 100% of timber will be sustainably sourced with full FSC or PEFC chain of custody. This certification ensures that all timber and timber-based products used on this project are legally harvested and traded products;

- Construction materials which have a low overall negative impact on environment and society assessed over the life cycle of the product will be specified where feasible;
- Low volatile organic compound (VOC) products will be specified internally where feasible to ensure a healthy indoor environment for residents.

4.3.2 The design of the development will apply readily available and standardised components from local producers and suppliers to minimise waste and wider supply chain environmental impacts. Whilst modern in terms of architectural design, the introduction of bespoke components and materials that have a greater potential impact will be avoided wherever possible. We are faced with unprecedented interruptions to construction supply chains currently, and these are set to continue into the foreseeable future. In this context, waste minimisation is essential and therefore standardisation wherever possible and workable from a design perspective is critical.

4.3.3 The Applicant will have systems in place to optimise materials ordering on a 'just in time' basis, and will create, via BIM or similar software, a schedule of materials to prevent the risk of over-ordering and therefore waste.

4.4 Construction Waste

Type and Quantity of Construction Waste

4.4.1 The average quantity of waste produced in the construction of residential developments is estimated to be 15.2m^3 per 100m^2 of floor area (DEFRA, 2009) and this can be broken down into the following waste product types:

Product	$m^3/100m^2$
Canteen/office/ad-hoc	1.73
Ceramics/bricks	1.44
Concrete	1.9
Electrical equipment	0.15
Furniture	0.08
Hazardous	0.06
Inert	0.67
Insulation	1.09
Liquids and oils	0.05
Metals	0.59
Packaging	2.71
Plaster/cement	1.87
Plastics	1.05
Timber	1.89
Grand Total	**15.2**

Table 2: Construction Waste by Product Type

4.4.2 While it is too early in the design and planning process to be able to accurately predict the quantity of waste arising from this specific building site, the data in table 2 has been combined with the draft accommodation schedule for the site to produce an estimate:

	Number of dwellings (indicative)	m^2 (indicative)	Total m^2 (indicative)	Total Construction Waste arising m^3
1 bed apartment	102	50	5,100	
2 bed apartment	64	70	4,480	
2 bed house	96	75	7,200	
3 bed house	113	89	10,057	
4 bed house	33	118	3,894	
5 bed house	16	144	2,304	
TOTAL	424		33,035	5,021

Table 3: Construction Waste Arising (Estimate)

4.4.3 While it must be stressed that this is an estimate, this figure can provide a benchmark for target setting: it is expected that the waste management interventions described in this section will result in a reduction in construction waste arising.

Construction and Demolition Waste Management

4.4.4 In line with Policy WMP3d of the Waste and Minerals Plan for East Sussex, the Applicant recognises the importance of construction waste minimisation and will work to ensure waste is managed sustainably throughout the development process.

4.4.5 The existing residential property (Chicory Cottage) and its associated outbuildings will need demolition prior to the construction of the new development. There will be opportunities to reduce the environmental impact of waste arising from this process, and to reuse components on the development site, thus reducing both waste arising and development costs.

4.4.6 In order to identify and exploit these benefits, a Demolition and Remediation Strategy will be produced to identify materials and how they will be managed in accordance with the different stages of the Waste Hierarchy, identifying:

- Materials to be reused or repurposed on-site with minimal processing;
- Materials to be reused on-site following some form of processing (for example crushed concrete for aggregates)
- What can be retained and sold into the wider supply chain for use off site;
- Materials to be recycled using licenced waste contractors;
- What must be disposed of, and how this can be done in the safest and most sustainable way given existing waste management practices.

4.4.7 During the construction design stage, the Applicant will proactively identify opportunities for the on-site reuse of other materials arising from site clearance and preparations. For example, the detailed design of gardens and other outdoor spaces will take account of retained soils to ensure they can be incorporated into the site.

4.4.8 The design of the site will also identify opportunities to maximise the use of reclaimed and recycled materials procured off site, for example in the sub-base for roads.

4.4.9 The Applicant will implement their sustainable procurement procedures and work to ensure that only materials needed are ordered on to the site to prevent overordering and unnecessary wastage.

4.4.10 Where waste must be removed from the site, the Applicant will only appoint licenced waste management contractors with a proven track record of delivering high levels of recycling.

4.4.11 Prior to construction, the Applicant will produce a detailed Waste Management Plan (WMP) which will require all contractors to implement strict waste management processes on site, including:

- Identifying a key individual responsible for delivering the overall WMP for the development;
- Management of waste by site operatives through site induction and ongoing training / site talks;
- Obtaining all appropriate licences from contractors to confirm contractual requirements;
- Storing materials appropriately to avoid weathering or accidental damage and ultimate wastage;
- Identifying suitable locations for the separation and storage of waste prior to removal from site to encourage higher levels of recycling;
- Measuring and reporting waste disposal, reuse and recycling;
- Identifying additional measures to reduce waste and increase reuse/recycling during the construction process;
- Scaffolding, hoarding and surplus building materials to be removed from site for use on subsequent construction projects.

4.4.12 The WMP will be a live document that will be updated throughout the design and construction process to reflect and respond to progress on site.

4.4.13 In addition to the above, it will be a contractual requirement that any contractor operating on the site commits to the Considerate Constructors Scheme and aims to achieve best practice under assessment. This will help further minimise the impact on the surrounding area and neighbours to the site.

4.4.14 The combined impact of these measures will be a reduction in construction waste arising from the proposed site, in accordance with local policy and guidance.

4.5 Operational Waste

Type and Quantity of Operational Waste

4.5.1 According to the DEFRA Waste Collection Statistics for 2019/20, 59,155 tonnes of waste were collected from Wealden district households during the year as follows:

Household Waste in Wealden 2019/20		Tonnes of Waste
Waste sent for recycling / composting / re-use	Dry recycling / re-use	15,213
	Green recycling / re-use	14,049
Waste not sent for recycling		29,893
Total household waste		**59,155**

Table 4: Household Waste in Wealden 2019/20

4.5.2 With an estimated 68,110 households in the district in 2018 (eastsussexinfigures.org.uk), this equates to approximately 868.5kg of waste per household, of which 429.6kg was recycled, composted or reused:

Waste per Household (estimate)		kg per household
Waste sent for recycling / composting / re-use	Dry recycling / re-use	223.4
	Green recycling / re-use	206.3
Waste not sent for recycling		438.9
Total waste per household		**868.5**

Table 5: Waste per Household in Wealden (Estimate)

4.5.3 These figures can be used to calculate an estimate of the operational waste arising from the proposed development annually across the 424 dwellings proposed.

Site Wide Household Waste (estimate)		Site wide estimate (kg)	Site wide estimate (tonnes)
Waste sent for recycling / composting / re-use	Dry recycling / re-use	94,704	95
	Green recycling / re-use	87,458	87
Waste not sent for recycling		186,091	186
Total Site Wide Waste		**368,253**	**368**

Table 6: Total Annual Operational Waste (Estimate)

Operational Waste Management

4.5.4 The Applicant will encourage property occupants to manage waste sustainably, in line with policy WMP3e of the Waste and Minerals Local Plan and this has been considered during the design of the development.

4.5.5 While final details are to be considered in full at Reserved Matters, it is likely that houses will have a private rear garden area with direct external access, while flats will have communal waste storage facilities. These will provide sufficient space for the discreet storage of bins, keeping waste storage away from the public domain, as advised in the Wealden Design Guide.

4.5.6 The site will also comply with the requirements set out in the Manual for Streets (based on Building Regulations and British Standards) for refuse collection in terms of distance between dwellings and bin collection points as detailed in the Design and Access Statement:

- 30m maximum distance from each dwelling to the bin collection point;
- 15m maximum distance from the back of the refuse vehicle to the bin collection point;
- Maximum of three steps for containers up to 250 litres (e.g. two wheel domestic bin).

4.5.7 Detailed swept path analysis has been completed to demonstrate that the site is accessible by East Sussex County Council refuse vehicles. Full details are included within the Transport Assessment.

4.5.8 Internally, the dwellings will be provided with integrated bins to split the different recycling streams prior to storage outside. Facilities will be easy to access and will be designed in line with the collection regime of the council which is currently understood to be:

- Recycling collected fortnightly (green bin);
- Residual waste collected fortnightly (black bin);
- Garden waste collected fortnightly (optional, chargeable service).

4.5.9 Welcome packs for new residents will include advice on waste reduction, reuse and recycling.

5 Climate Resilience and Adaptation

5.1 Adapting to the Future

5.1.1 The ability of the development to adapt to anticipated future changes in the climate is an important aspect of its longevity, and ultimate habitability. The principle of adaptation applies to both the built and external environment, and indeed how they interact.

5.1.2 SPO9 of the Core Strategy Local Plan requires that developments consider climate change adaptation through careful and considered design.

5.1.3 This section details how the Applicant is addressing climate resilience and adaptation for the site.

5.2 Reducing Overheating Risk Through Design

5.2.1 The risk of the overheating of living spaces is of concern, given our knowledge of future climate. The new *Approved Document O: Overheating* which comes into effect in June 2022 details requirements for mitigating the risk of overheating and methods for demonstrating compliance including the use of a compliance checklist or the CIBSE Guide *TM59 Design Methodology for the Assessment of Overheating Risk in Homes* (CIBSE, June 2017).

5.2.2 When using the CIBSE model for homes which are predominantly naturally ventilated, compliance is based on passing both of the following criteria:

> *(a) For living rooms, kitchens and bedrooms: the number of hours during which ΔT is greater than or equal to one degree (K) during the period May to September inclusive shall not be more than 3 percent of occupied hours. (CIBSE TM52 Criterion 1: Hours of exceedance).*
> *b) For bedrooms only: to guarantee comfort during the sleeping hours the operative temperature in the bedroom from 10 pm to 7 am shall not exceed 26°C for more than 1% of annual hours. (Note: 1% of the annual hours between 22:00 and 07:00 for bedrooms is 32 hours, so 33 or more hours above 26 °C will be recorded as a fail). The third criterion sets an absolute maximum daily temperature for a room, beyond which the level of overheating is unacceptable.*
>
> *(CIBSE, 2017)*

[ΔTis defined as the difference between the actual operative temperature in the room at any time and the limiting maximum acceptable temperature, rounded to the nearest whole degree].

5.2.3 As the specification for this site is developed further, 'TM59 compliant' tests could be undertaken where necessary to ensure overheating continues to be minimised. In order to provide a more robust analysis, and in the context of a changing climate, the use of a 'future weather' file may also help ensure that we can be more certain of the impact in the future, and the resulting efficacy of the solutions put forward where any overheating risk exists.

5.2.4 Should it be identified as an issue, acceptable strategies for reducing overheating risk described in Approved Document O include:

- Limiting solar gains:
  - Fixed shading devices such as shutters, external blinds, overhangs or awnings;
  - Glazing design including size, orientation, glass g-value and depth of window reveal;
  - Shading provided by adjacent permanent structures.
- Removing excess heat:
  - Opening windows and ideally cross ventilation;
  - Ventilation louvres in external walls;
  - A mechanical ventilation system;
  - A mechanical cooling system as a last resort.

5.3 The Multiple Benefits of Open Space and Vegetation

5.3.1 The proposals for the site feature significant areas of high quality open space, with 66% of the total site area allocated for green infrastructure:

- Retained and protected Ancient Woodland, with a 15m buffer to development areas;
- A new 21.3ha woodland park incorporating an 18.1ha area of Suitable Alternative Natural Greenspace;
- Additional areas of landscape planting, natural greenspace and SuDS to the edges of the site, and new soft landscaping features within the development including a number of trees and hedgerows;
- 1.3ha of amenity open space with potential for a sports pitch and natural play areas;
- 0.9ha of amenity space / community orchard to the south of Downlands Barn.

5.3.2 This landscape led approach will provide multiple benefits in a changing climate. From a microclimatic perspective these landscape features, trees, will help provide a comfortable external environment in hot periods whilst reducing heat gain in buildings, therefore decreasing the need for mechanical cooling.

5.3.3 Trees also contribute to the reduction of wind speeds, improving comfort levels and reducing air infiltration into buildings on windier days. Trees sequester CO_2 and improve air quality through dry deposition of gases (including NO_x, SO_X, PM10 and O_3) whilst also helping reduce levels of ambient noise.

5.3.4 This approach will also result in biodiversity gains through ecosystem improvement, including extending and enhancing existing woodland and scrub areas, enhancing grassland to provide species rich meadow and providing additional native tree species planting throughout the site. The extensive SANG area will be of a quality and type suitable as mitigation to offset the impact of any new development on the Ashdown Forest Special Protection Area (SPA). The SANG proposals are the subject of a separate detailed planning application.

5.4 Managing Water in a Changing Climate

5.4.1 Any new development on a previously undeveloped site will inevitably increase the amount of hard standing (roofs, roads, pavements) and therefore the amount of surface water run-off. Furthermore, rainfall levels in 20-30 years' time are expected to be very different to current levels, not necessarily in annual total volume, but with respect to the rainfall distribution throughout the year and the number of heavy downpours and storm events.

5.4.2 The integration of different Sustainable Urban Drainage (SuDS) features into the landscape layout will therefore be pivotal in its development in order to enable the necessary storage volumes associated with a 1 in 100 year storm event, plus a 40% allowance for the impacts of climate change.

5.4.3 The SuDS Strategy for the site has been carefully designed so that the flow of water within the Ancient Woodland ghylls are retained as per the existing situation. Surface water run off will be restricted to the greenfield runoff rate to mimic the existing situation, thus ensuring flood risk is not increased. A series of attenuation basins will slow run off prior to discharge into the ghylls.

5.4.4 The Flood Risk Assessment accompanying this application provides full detail in relation to the level of flood risk and management of surface water flows on the site and should be referred to for full details in this regard.

6 Water Efficiency

6.1 The Water Hierarchy

6.1.1 Water efficiency becomes increasingly important in a changing climate with diminishing water resources.

6.1.2 We consume a vast amount of potable water in non-potable situations, including flushing the toilet, washing the car and irrigating our gardens. Only a small proportion of our *potable* mains water is used for drinking, cooking and personal washing:

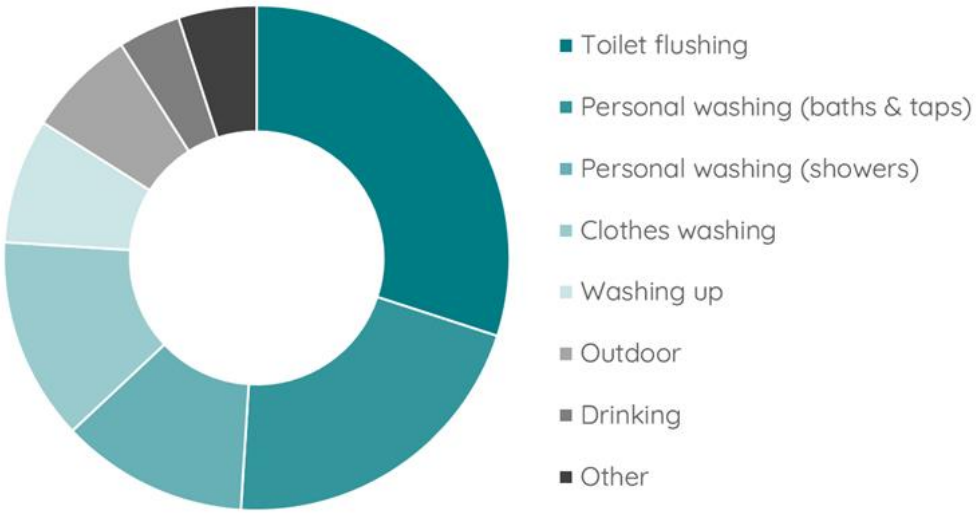


Figure 9: Domestic Water Consumption by End Use (UK)

6.1.3 The national average for water consumption is around 143l per person per day. In order to reduce this figure, the management of water in the proposed development will follow the principles of the water hierarchy:

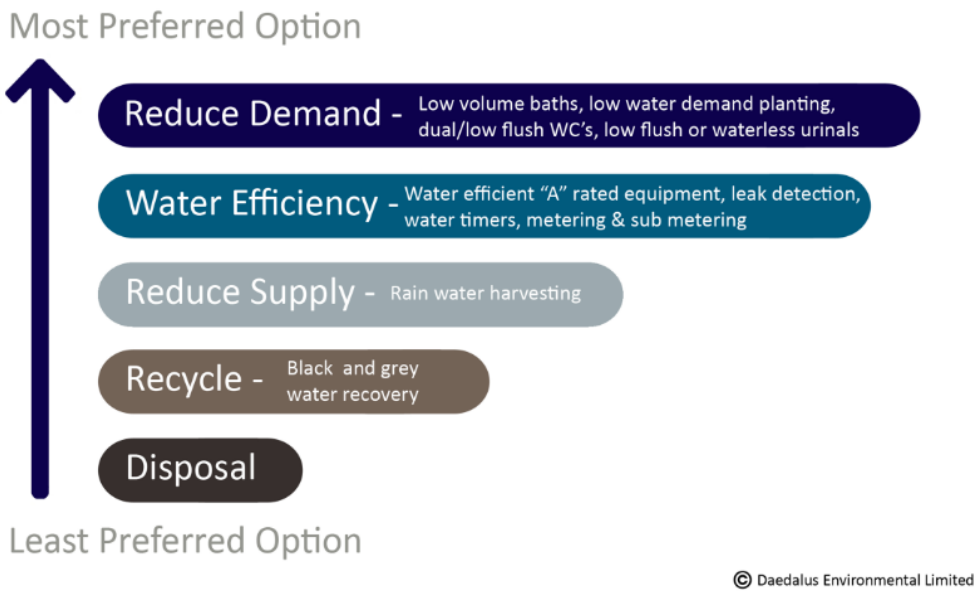


Figure 10: The Water Hierarchy

6.2 Water Reduction Measures

6.2.1 As described in section 2, Part G of the Building Regulations pertains to sanitation, hot water safety and water efficiency and the enhanced standard requires a water use target of 110 litres per person per day.

6.2.2 Water efficiency measures (fixtures, fittings and appliances) and rainwater recycling measures will be specified in the development which considerably reduce potable water use so that daily potable/wholesome water use will be calculated to not exceed 110 litres per person per day, in line with this enhanced Building Regulations standard. The following table is an illustrative list of water specifications which typically achieve this:

	Measure	Unit	Performance / Specification
1	Showers	Litres per minute	10
2	Aerated taps	Litres per minute	3
3	Kitchen sink taps	Litres per minute	4
4	Bath	Litre capacity to overflow	140
5	WC	Litres per flush	4 / 2.6 (dual flush)
6	Washing machine	Litres per kg dry load	7
7	Dishwasher	Litres per place setting	1.08

Table 7: Illustrative Water Specifications

7 Accessibility, Sustainable Transport and Connectivity

7.1 Accessibility and Sustainable Transport

7.1.1 Accessibility is a key aspect of sustainability and is described as such in the NPPF. Any new development needs to have easy to use, safe and obvious links into the surrounding community to prevent isolation and disconnection, to ease the use of existing facilities and services, and to facilitate commuting. Spatial Planning Objective SPO7 of the Wealden District Core Strategy Local Plan (2013) reinforces this, stating that developments should be planned in accessible locations, where they can most closely relate to public transport opportunities.

7.1.2 The proposed site is adjacent to an existing residential development and is approximately 1km from Uckfield Town Centre where a range of retail, health, education and leisure facilities are available.

7.1.3 The Transport Statement which accompanies this application describes how proposed improvements for cyclists and pedestrians will ensure that future residents will have good access to these existing local facilities. These include plans to improve the existing highway to provide footways on a section of Snatts Road, and improvements to the existing public right of way which runs from Snatts Road to Hunters Way.

7.1.4 The proposed properties will include a secure and weatherproof means of cycle storage in line with local requirements: some of the houses will have garages and those that do not will have sheds provided. The apartments will have access to a secure, enclosed communal cycle store. Visitor cycle parking will be provided in core locations overlooked by existing development.

7.1.5 A new community bus service is proposed to serve the development, providing connections to local employment sites, schools, the town centre and Uckfield Railway Station. The route and timetable will be agreed in consultation with residents and East Sussex County Council.

7.1.6 Uckfield Railway Station in the town centre has regular services into London and is adjacent to the bus station which provides a wide range of services to neighbouring towns and villages.

7.2 Provision of Electric Vehicle Charging Points

7.2.1 Increasingly, energy and transport systems are becoming interlinked, as the nation transitions from the use of petrol and diesel vehicles to zero emission solutions based around electric charging and cleaner, hydrogen-based fuels. Crucially therefore, there is a need for charging infrastructure to support this wholesale shift to cleaner vehicle technology.

7.2.2 The *East Sussex Guidance for Parking at New Residential Development (2017)* encourages developers to include charging facilities for electric vehicles at all properties with off street parking. The emerging *Approved Document S: Infrastructure for Charging Electric Vehicles (December 2021)* details the specific requirements that will come into force in June 2022 (see section 2).

7.2.3 The Applicant has therefore committed to designing and managing the power network to provide EV charging infrastructure as specified by the emerging Part S. While the *Approved Document S: Infrastructure for the Charging of Electric Vehicles* should be referred to for full details in this regard, this will include a dedicated EV charging point for every home with associated parking.

7.3 Provision of Fibre-to-the-Property

7.3.1 The availability of high quality broadband infrastructure is increasingly viewed as critical to the functioning of a development and its continued attractiveness to incoming residents.

7.3.2 It is likely that the dwellings will be provided with Fibre-To-The-Property (FTTP) to enable access to broadband services should residents wish to connect and this will be explored further at the detailed design phase.

7.3.3 Fibre connections provide a far better user experience that the average connection in the UK, and enable a transition to a more sustainable future including:

- The ability to operate smart devices in the home without a risk of insufficient bandwidth, and with zero buffering;
- Crystal clear video calling, web-conferencing and file sharing that facilitates better home working;
- High speed streaming capability on multiple devices, for different family members, simultaneously;
- Enhanced audio quality for users of VoIP and PBX, business class phone systems that use internet connection;
- The ability to operate automated services, payments and billing;
- Improved reliability and reduced susceptibility to inclement weather including storms;
- Potentially symmetrical plans –allowing identical upload and download speeds;
- Improved reliability in providing the best possible access to a business's hosted services and cloud-based applications.

7.3.4 Better quality, reliable internet connections for all have wider social ramifications too – reducing the risk of exclusion, a lack of access to services (which are increasingly internet based) and enabling people to better connect with society as a whole.

8 Summary

8.1.1 This *Energy, Waste & Sustainability Statement* has been commissioned by Gleeson Land (the Applicant) to detail how issues relating to sustainability are being implemented for the proposed development of up to 424 residential dwellings on land at Downlands Farm, Uckfield within the Wealden district of East Sussex.

8.1.2 Throughout the document, national and local planning policy objectives and standards have been addressed to demonstrate the Applicants' commitment to these issues.

8.1.3 In particular, the Statement provides as much detail as is possible at this outline planning stage to demonstrate compliance with relevant policies in the Wealden District Core Strategy Local Plan (2013), the saved policies of the Wealden Local Plan (1998) and the imminent Building Regulation updates:

- Homes will be highly energy efficient, adopting a fabric first approach and with specifications above current Building Regulations for insulation detailing. They will be orientated to maximise solar gain where possible;
- There will be no burning of fossil fuels on site, with no natural gas supplied; it is the intention that heating will be via highly efficient air source heat pumps;
- The development will employ a combination of highly efficient fixtures, fittings and appliances to reduce domestic water use to achieve the 110 l/p/d target;
- Electric vehicle charging points will be provided to every property with associated parking in line with emerging policy requirements;
- Construction and operational waste will be managed according to the principles of the Waste Hierarchy with a focus on waste prevention, re-use and recycling;
- Significant areas of open space will be provided, with the existing features of ecological value retained and enhanced with native planting to increase levels of biodiversity;
- Buildings will be designed and specified to adapt to a changed climate: overheating will be managed through good design; the retention of existing trees and additional planting will provide more comfortable microclimates in warmer weather; the landscape design will provide multi-functional benefits, supporting increased biodiversity and enhancing the overall aesthetic.

8.1.4 A summary of the recommendations made throughout this Statement to achieve policy requirements is provided in Appendix A.

8.1.5 As the planning and development process progresses, the approach proposed will be kept under review. The final design solution and associated detail can be provided at the Reserved Matters stage.

8.1.6 It can be concluded that the proposals for the development maximise the site's assets and layout in relation to sustainable design, creating an attractive, environmentally sound development.

9 Appendix A – Key Recommendations

Section		Policies Addressed	Key Recommendations
3	Energy Statement	Wealden Local Plan 1998 Saved Policy EN1; EN27; HG7. Wealden District Core Strategy Local Plan 2013 SPO9; SPO13.	- Follow the priorities of the Energy Hierarchy - Ensure building orientation is such that dwellings maximise solar gain as far as possible - Air permeability levels should be 5m^3/m^2@50Pa or less - Minimise energy consumption with a highly efficient building envelope - Install energy efficient lighting and appliances - Commit to no burning of fossil fuels on site - Investigate the installation of low carbon air source heat pumps for space and water heating - Consider WWHR for properties where feasible
4	Waste Minimisation Statement	Wealden Local Plan 1998 Saved Policy EN1. East Sussex Waste and Minerals Local Plan 2013 WMP3a; WMP3d; WMP3e.	- Follow the principles of the Waste Hierarchy - Implement a Sustainable Procurement Policy and source materials from suppliers with environmental accreditations, using local suppliers where possible - Produce a Site Waste Management Plan which will require contractors to implement strict waste management processes - Produce a Demolition and Remediation Strategy to manage waste arising from on-site demolition - Ensure contractors commit to the Considerate Constructor Scheme - Provide sufficient and accessible bin storage to facilitate operational waste management and recycling
5	Climate Resilience and Adaptation	Wealden District Core Strategy Local Plan 2013 SPO9; SPO13.	- Control overheating risk by applying the standards set out in the new Approved Document O: Overheating. - Include street trees, shrubbery and open spaces throughout the site - Closely follow the FRA recommendations including those for SuDs
6	Water Efficiency	Wealden Local Plan 1998 Saved Policy EN1.	- Specify fixtures, appliances and fittings that reduce potable water use including aerated taps, low/dual flush WCs, low capacity baths - Provide opportunities for rainwater recycling i.e. rainwater butts
8	Accessibility, Sustainable Transport and Connectivity	Wealden District Core Strategy Local Plan 2013 SPO7.	- Provide individual EV charging points in line with the requirements of the new Approved Document S including to all properties with associated parking - Investigate providing access to Fibre-to-the-Property

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