

Sustainability Statement

Sheringham Recycling Centre


Prepared for Stantec, on behalf of Norfolk County Council
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envision



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Author	Signature
Simon Rainsford BSc MSc	

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EXECUTIVE SUMMARY

1. This Sustainability Statement has been prepared by Envision on behalf of Norfolk County Council (The Applicant) and is submitted in support of a full planning application for the creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Improvement to the existing junction between A148 Holt Road and layby accessing the recycling centre.
2. The proposed development is being brought forward to replace the Sheringham Recycling Centre to provide a larger facility. It forms part of a wider strategy by Norfolk County Council to enhance the network of recycling centres across the county by making them more efficient and suited to the county's planned growth.
3. The primary purpose of this document is to explain how the scheme would meet with Norfolk County Council sustainability policies held within the Norfolk Minerals and Waste Development Framework Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026. The statement also summarises the strategic benefits of the scheme in terms of sustainability.
4. The following conclusions have been determined from the sustainability review:
 - The scheme will include a reuse centre, helping to divert materials for reuse rather than disposal. A proposal which is in full accord with the Government's resources and waste strategy.
 - The development includes a high-quality staff welfare cabin, promoting the wellbeing of staff on site.
 - Lighting has been largely designed out of the scheme, with the proposal to only operate the site for public use during daylight hours.
 - The specification of the cabin, which is expected to be a modular building will ensure it is highly energy efficient, including LED lighting, good standards of insulation and air tightness.
 - A circa 15 m² PV array will be incorporated on the roof of the welfare cabin capable of meeting 10% of the site's energy demand through renewable energy.
 - The scheme will include sustainable drainage and pollution control measures.
 - Landscape planting around the perimeter of the development will include native plant species that are considered beneficial to local wildlife.
 - Bat and bird boxes will be installed within the surrounding area, upon semi-mature trees within the site.
 - The site be operated by a contractor that operates an ISO 14001 Environmental Management system. Travel planning will be promoted through the provision of cycle spaces, alongside a drying room and locker facilities.

1 INTRODUCTION

- 1.1 This Sustainability Statement has been prepared by Envision on behalf of Norfolk County Council (The Applicant) and is submitted in support of a full planning application for the Creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Improvement to the existing junction between A148 Holt Road and layby accessing the recycling centre.
- 1.2 The primary purpose of this statement is to explain how sustainable development principles have been considered within the scheme proposals in accordance with relevant national and local planning policies and guidance.
- 1.3 This statement is structured as follows:
- Section 2 provides a description of the site and the development proposals;
 - Section 3 provides a description of the main sustainability policies relevant to the development proposals;
 - Section 4 Provides a sustainability appraisal;
 - Section 5 provides a conclusion.

2 CONTEXT AND PROPOSALS

Overview

- 2.1 Norfolk County Council provides 20 recycling centres across the county for the free disposal of household waste and paid disposal of non-household waste. Norfolk’s recycle rates across the council was 44.4% in 2020/21, however landfill diversion rates are higher for recycling centres by comparison to these overall rates. This emphasises the importance of recycle centres in helping to meet long-term objectives to reduce waste to landfill and deliver a circular economy.
- 2.2 In 2015 Norfolk County Council published its review - Provision of Household Waste Recycling Centre Services¹. This summarises the pressures on the existing 20 recycling centres and options for future infrastructure provision across the county. The Sheringham facility is constrained by its small size. A site with increased capacity is needed to address this.

Location and Existing Situation

- 2.3 The proposed development site is located to the north of the A148 Holt Road.

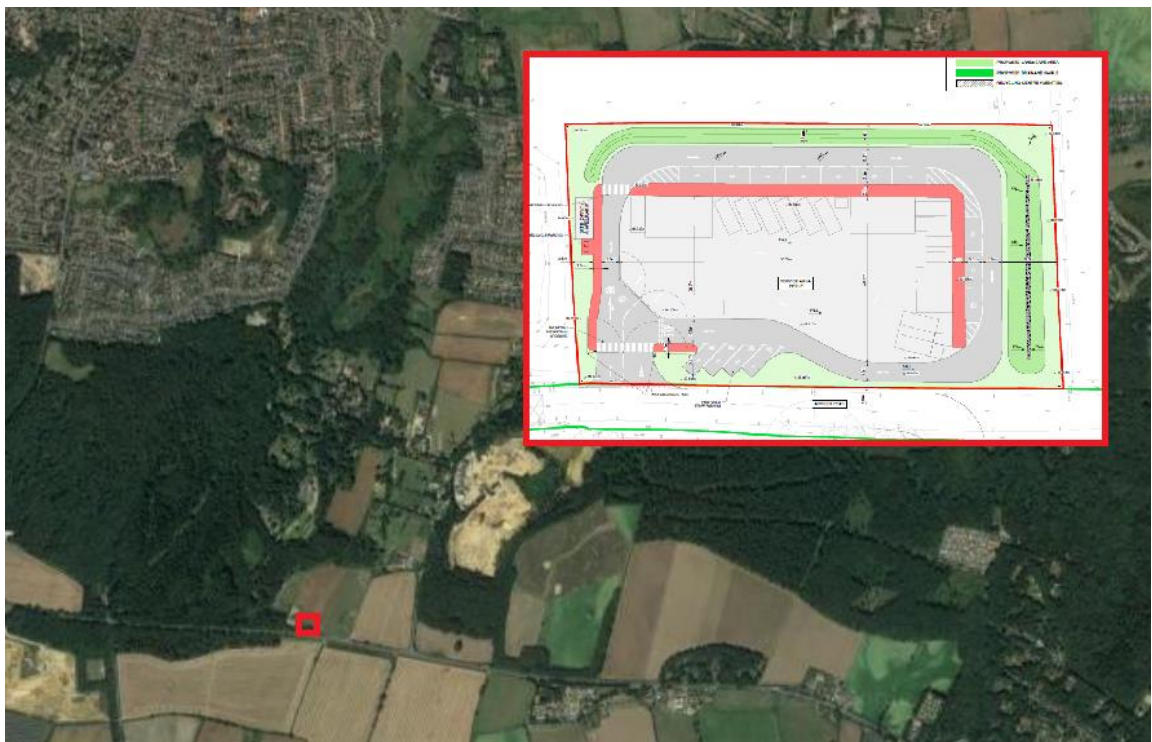


Figure 2.1 – Site Location

¹ Norfolk County Council. Provision of Household Waste Recycling Centre Services. Appendix M – Recycling Centre Infrastructure Strategy 2015 Review

The Proposed Development

2.4 The planning application seeks consent for the construction of a purpose-built recycling centre. The centre will include:

- Welfare building;
- Reuse shop;
- Perimeter fencing;
- Hardstanding and Service yard;
- Waste containers;
- Car parking;
- Waste service bays
- Bike storage;
- Perimeter landscaping.

2.5 The layout of the proposed development is shown in figure 2.2.

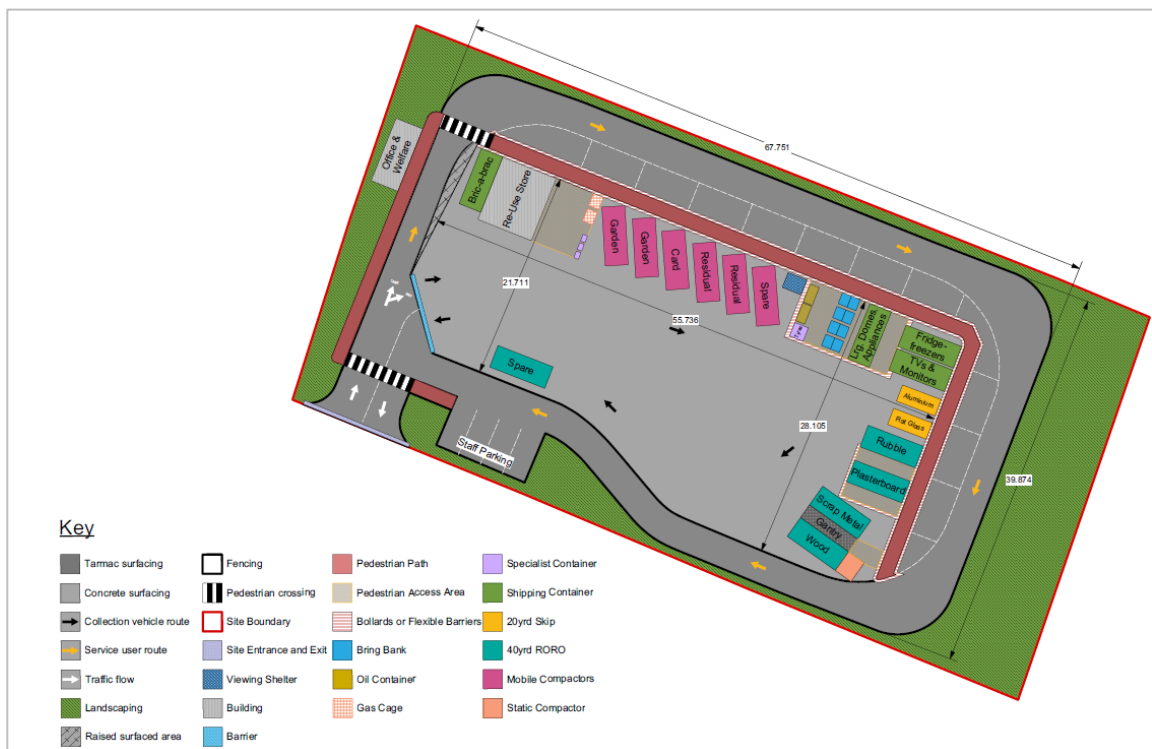


Figure 2.2 – Proposed Development Layout

3 SUSTAINABILITY POLICY CONTEXT AND APPLICATION

3.1 A key mechanism for delivering the principles of sustainable development lies within the UK planning system, which is implemented through national guidance along with regional and local planning policies. A review of all the relevant policy documents was undertaken in order to gain an understanding of the guiding policies for energy, CO₂ reductions and sustainable design.

National Policy

National Planning Policy Framework

3.2 The revised National Planning Policy Framework (NPPF) was released on 20th July 2021. This replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019. It sets out the framework for all planning policy in England and how these policies are expected to be applied. 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.

3.3 The NPPF sets out a presumption in favour of sustainable development, and the need to support economic growth through the planning system. Achieving sustainable development means that the planning system has three overarching objectives, 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 objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.4 Planning plays a key role in helping shape places to achieve radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. The NPPF does not include detailed measures on sustainable design codes and standards to apply, although expects that when setting any local requirement for a building's sustainability, local planning authorities should do so in a way consistent with the national technical standards.

3.5 The NPPF states that the NPPF should be read in conjunction with the Government’s planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies [in the NPPF], where relevant.

National Planning Policy for Waste

3.6 The National Planning Policy for Waste (NPPW, 2014) recognises that the planning system can play a pivotal role in delivering Government waste ambitions through delivery of sustainable development and resource efficiency, including:

- provision of modern infrastructure, local employment opportunities and wider climate change benefits;
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

Norfolk County Council Policies and Technical Requirements

3.7 The most relevant policies when considering sustainability requirements for waste schemes are those produced at county level.

Norfolk Minerals and Waste Development Framework Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026

3.8 Policy CS13 of the DMPDPD – ‘Climate change and renewable energy generation’ includes a number of provisions, some of which are deemed relevant to the design of the facility. Part 1 of the policy states:

“ All opportunities for new minerals and waste developments (both brand new sites and extensions to existing sites) to generate renewable energy on-site will be welcomed and should be explored fully, with a minimum of 10 per cent generated from decentralised and renewable or low-carbon sources, wherever this is practicable. Where it is not considered practicable to meet this 10 per cent minimum – perhaps because of financial reasons, site size, geographical restraints of a site, and/or other environmental considerations/constraints (e.g. landscape impacts) – appropriate evidence must be provided to the County Planning Authority”.

3.9 This part is deemed relevant. The site will generally be a low energy development, however there are two buildings on site – the staff welfare building and reuse centre, which will consume electricity for lighting, heating and small power demands. In addition, there are other site demands, for example from site lighting. This statement addresses how these demands would be minimised and met in part by renewable energy.

3.10 Policy CS13 goes on to state:

“All new residual waste treatment plants and any new non-hazardous landfill sites will need to generate electricity and/or capture heat, unless it can be demonstrated that this is not practicable. An example of where this requirement might not be appropriate would be for a plant producing refuse derived fuel (through an MBT process), where this fuel was combusted at a different plant elsewhere.

The co-location of large waste plants generating heat and/or electricity with other nearby industrial and/or residential users of the heat and/or energy will be supported. Waste treatment facilities accepting biomass waste will be required to generate renewable energy”.

3.11 These provisions are not deemed relevant. Whilst materials will be consolidated at the site, there will be no processing or potential for direct energy recovery on site.

“ Potential minerals and waste developers will need to demonstrate that, in line with PPS25, the sites can be developed, operated and (where relevant) restored without unacceptable flood risk to the site itself, and also to ‘downstream’ land uses, taking into account potential climate change impacts (e.g. higher future rainfall rates)”.

3.12 This is deemed relevant, although it is material to note that PPS25 is no longer a material consideration, and instead provisions for flood risk and drainage within the NPPF should be recognised. A separate flood risk and drainage statement has been prepared to address this. The overall sustainable drainage proposals are summarised within this Statement.

3.13 The DPMDPD also includes Development Management Policy DM11 – ‘Sustainable construction and operations’:

“Sustainable development will be promoted by requiring proposals for mineral extraction and associated development and waste management facilities to demonstrate consideration of:

- ***Design standards: good design and layout including the BREEAM “Very Good” or “Excellent” standard (or similar where no BREEAM standard exists) in the design of new buildings or plant;***
- ***Sustainable materials: the use of recycled and secondary materials (including aggregates) in the construction of the facility and associated transport infrastructure should be maximised; and***

- *Water efficient design, including water recycling and sustainable drainage measures.*
- *Operators will be encouraged to adopt an environmental management system (EMS), such as ISO 14001, to minimise the environmental impacts from operations.*
- *Evidence as to how the sustainable demolition, construction and operation of a proposal will be implemented must accompany the planning application. Applicants shall provide information appropriate to the planning application on the following matters:*
 - a. the type and volume of waste that the development will generate (both through the construction and operational phases);*
 - b. on-site waste recycling facilities to be provided (both through the construction and operational phases);*
 - c. the steps to be taken to minimise the use of raw materials (including hazardous materials) in the construction phase through sustainable design and the use of recycled or reprocessed materials;*
 - d. the steps to be taken to reduce, reuse and recycle waste (including hazardous wastes)*
 - e. If waste generated during construction is to be disposed of elsewhere, the distance it will be transported and the method of transportation; and*
 - f. The steps to be taken to ensure the maximum diversion of waste from landfill (through recycling, composting and recovery) once the development is operational.*

The use of Site Waste Management Plans for development proposals below the legal threshold of £300,000 is encouraged, as is the usage of the SMARTWaste project tool. Any measures required will be secured through planning conditions and/or planning obligations”.

3.14 This policy is deemed relevant however the requirements for development to obtain a BREEAM rating, in this case, are not thought to be appropriate. BREEAM is applicable to non-domestic buildings and whilst there are two buildings proposed, these are small and will be procured through a modular building supplier. These types of buildings do not readily align to the BREEAM standards, albeit that some aspects of BREEAM, such as water efficient design and sustainable drainage will be adopted for the development. BREEAM is not proposed, however the principles which align with BREEAM will be followed where appropriate as explained within this statement.

Norfolk Minerals and Waste Local Plan Publication, May 2022

3.15 The County Council is preparing a Norfolk Minerals and Waste Local Plan Review, to consolidate the three adopted DPDs into one Local Plan, ensure that the policies within them remain up-to-date and to extend the plan period to the end of 2038. The publication document is open for a

period of representation between 9am Wednesday 28 September until 5pm on Friday 11 November 2022.

- 3.16 The document explains that The design and siting of new development can contribute to mitigation and adaption to climate change. New minerals development and waste management facilities should therefore include appropriate measures to ensure mitigation and adaption to climate change.
- 3.17 Proposed developments should follow the energy hierarchy by: 1. reducing the need for energy usage through their design, construction and operation; 2. using energy efficient mechanical and electrical systems, and 3. by using renewable energy.
- 3.18 Policy MW3: Climate change mitigation and adaption –

Proposals should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

New minerals sites and waste management facilities (including extensions to existing sites) will, through their design, construction and operation, be expected to: minimise their potential contribution to climate change through reducing carbon and methane emissions, incorporate energy and water efficient design strategies and be adaptable to future climatic conditions.

Proposals for new minerals and waste developments (including extensions to existing sites) will therefore be expected to:

- A. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption, including maximising cooling and avoiding solar gain in the summer,***
- B. be planned so as to minimise greenhouse gas emissions;***
- C. set out how the proposal will make use of renewable energy, including generating the energy used on site from decentralised and renewable or low-carbon sources. Where on-site renewable or low-carbon energy generation is not practicable, evidence must be provided to the County Planning Authority, and the applicant should source the electricity required from renewables through an energy supplier;***
- D. use sustainable drainage systems, rainwater harvesting, stormwater harvesting, including from impermeable surfaces wherever feasible and layouts that accommodate wastewater recycling where a connection to the public sewerage network is required;***
- E. take account of potential changes in climate including rising sea levels and coastal erosion;***
- F. take opportunities to incorporate trees, retain existing trees and include measures to assist habitats and species to adapt to the potential effects of climate change wherever possible;***
- G. set out how the transportation related to the development will help reduce carbon emissions and incorporate proposals for sustainable travel, including travel plans where appropriate; and h) for waste management proposals, set out how the principles of the waste hierarchy have been considered and addressed.***

Local Validation Requirements

3.19 The Norfolk County Council Local List for Validation of Planning Applications (May 2016) states that in respect of Sustainability Statements, the information required is:

“How the development complies with sustainability principles and promotes sustainable design.

How the development will generate a minimum of 10% of its energy on-site from decentralised and renewable or low carbon energy sources. The type of energy source should be suitable for the location. Where it is proposed that it is unviable to generate a minimum of 10% of its energy on-site from decentralised and renewable or low carbon energy sources than a detailed report explaining the reasons why it is unviable is required. The Report should provide evidence.

For Minerals and Waste proposals: Demonstration of the consideration of design standards, use of sustainable materials and water efficient design. Evidence of sustainable demolition, construction and operations. Details of how the development has sought, to achieve standards of design that meet ‘outstanding’ or ‘very good’ or ‘excellent’ BREEAM standard or such other recognised standard that has been agreed with the County Planning Authority as an appropriate measure during the pre-application stage.”

Structure of this Statement

3.20 This sustainability statement specifically sets out to address the above requirements, which can be summarised as follows by the following topics and questions:

- **Energy** - How does the development generate renewable energy on-site, with a minimum of 10 per cent generated from decentralised and renewable or low-carbon sources?
- **Sustainable materials** - How has the use of recycled and secondary materials (including aggregates) in the construction of the facility been maximised?
- **Water efficient design** - How has water recycling and sustainable drainage measure been considered?
- **Sustainable drainage and pollution control** - How has sustainable drainage been considered?
- **Waste management** - How will waste be managed during construction and operation?
- **Ecology and Biodiversity** - How is ecology being protected and what measures are proposed to enhance the sites value?
- **Site Operations** - How will the site managed to promote better environmental outcomes?

4 SUSTAINABILITY APPRAISAL

Energy

- 4.1 Policy CS13 requires that a minimum of 10 percent of the sites energy demand should be generated from decentralised and renewable or low-carbon sources, wherever this is practicable.
- 4.2 In general, the recycling centre will be a low energy operation. There will be no gas supply to site and power requirements are expected to be limited to running the welfare building and reuse centre.
- 4.3 Site electrical consumption from these uses is predicted based on benchmark figures for modular offices derived from SBEM calculations undertaken by Envision for simple modular offices on industrial sites. Energy demands for the lighting scheme is calculated based on the specification of the lighting and predicted operational hours as detailed in table 4.1. No further unregulated demands, for example for forklift truck charging has been included.

Table 4.1. – Predicted energy consumption

Buildings	Approximate Area	kWh / M ₂ / Annum	kWh Annum
Welfare	14	400	5,600
Re-use store	27	400	10,800
Total			16,400 kWh / Annum

- 4.4 It should be noted that this policy relates to energy demand on new buildings, and typically those that are subject to building regulations. According to Part L of the Building Regulations. The welfare office would constitute a stand-alone building, with a total useful floor area of less than 50m². Such small buildings are exempt from the energy efficiency requirements laid out in Part L of the regulations. Notwithstanding this exemption, these will be constructed with robust sustainable design principles to align with the sites overall environmental ambition.
- 4.5 To reduce energy demand, the modular buildings will be specified to achieve a high standard of energy efficiency. The cabin will include LED lighting throughout with presence detection. Fan powers for WC extract will be low and heating will be limited to simple electric panel heating.
- 4.6 The combined energy demand for the buildings has been calculated to be 16,400 kWh per annum. In order to meet at least 10% of this demand (1640 kWh / Annum), PV panels are proposed on the roof of the reuse centre.
- 4.7 Mounted at 30⁰ in a generally southerly direction, it is anticipated that the 10% demand could be met with a PV array of 2.0 kWp, capable of generating 1,700 kWh / Annum and covering an area of 15 m².

Sustainable materials

- 4.8 Durability is an important factor in the design of the facility. There will be heavy machinery operating within the service yard and cars and Light Good Vehicles (LGVs) in circulation. The materials will be designed to be durable and impact resistant.
- 4.9 Materials will be responsibly sourced. It will be responsibility of the Principal Contractor to source the materials required for the construction.
- 4.10 Concrete and steel will be sourced from suppliers accredited with BES6001. Where possible other materials will be sourced from suppliers than can demonstrate their environmental performance through accreditation to EMS 14001.

Water Efficiency

- 4.11 Water use on the site will be limited to domestic uses and for periodic washdown. The welfare building is expected to include WCs, vanity basins and kitchen taps for staff use. Water efficient fittings will be installed, which are recognised under the BREEAM criteria.
- 4.12 Washdown may also be required from time to time to maintain hygiene. This will be supplied by borehole water.
- 4.13 As water consumption for the site will be low, there are generally limited opportunities for the recycling/ reuse of water on-site.

Sustainable Drainage and pollution control

- 4.14 A Flood Risk Assessment has been undertaken by Stantec which includes a drainage solution for the site. In general the site is less vulnerable to flood risk due to its use category. The site is located in an area defined as having a low risk of flooding (Flood Zone 1). The Flood Risk Assessment evaluates the risks as being low from all sources, including an allowance for increased rainfall intensity as a result of future climate change.
- 4.15 A drainage strategy has been defined which ensures that adequate treatment is provided for the development. The strategy uses sustainable drainage techniques. Further details of that are shown on the drainage strategy drawing, which supports the planning application.

Waste management

- 4.16 Waste will arise from construction activities. In order to control any waste generated on-site during construction, the contractor will separate the main waste streams, prior to them being taken to an appropriate waste facility for recycling, recovery or disposal.
- 4.17 A Resource Waste Management Plan will be developed and maintained by the contractor, which will draw from Smart Waste principles.
- 4.18 It is anticipated that poured concrete will be needed for the service yard and manoeuvring area. It is not anticipated that there will be a need for batching plant on site.

- 4.19 The office and welfare cabin will be pre-fabricated offsite with only limited final assembly. This will reduce waste arisings on site and enable waste to be controlled more carefully by the manufacturers of the modular buildings.
- 4.20 In operation, there will be very limited waste generated by staff activities on site. Wastes generated will include general office waste and food wastes. Appropriate recycling bins will be installed for operatives at the Site, which will be transferred to the larger holding containers on a regular basis.

Ecology and Biodiversity

- 4.21 A preliminary ecological appraisal report has been prepared by Geosphere Environmental Limited and is submitted with the application. The report follows a phase 1 walkover survey, which determined that the site comprises bramble scrub, cereal crops; tall ruderal vegetation; grassland and broadleaved woodland.
- 4.22 The findings of the survey confirm that the habitats onsite have the potential to support foraging bats, nesting birds, badgers, hedgehogs, reptiles and common assemblages of invertebrates.
- 4.23 Planting of species that are beneficial to wildlife to provide additional habitat for invertebrates and in turn greater foraging opportunities for species such as hedgehog and foraging bats.
- 4.24 The report sets out various measures to avoid, mitigate and compensate for the loss, alongside recommendations for enhancement. This includes planting native plant species beneficial to wildlife in order to provide additional habitat for invertebrates, which will in turn provide a food source for reptiles, birds, bats, and Hedgehog. The report also recommends that a new woodland strip to the north of the site is created to provide additional habitat for reptiles, birds and bats.

Operations

- 4.25 The site will be run by a nominated waste contractor – Norfolk Environmental Waste Services (NEWS), part of Norse Commercial Services, who will implement a number of operational controls. To support the operation, the following is proposed:
- Cycle storage will be provided to promote staff cycling to the development;
 - Drying space, as well as lockers and a changing area; and
 - NEWS will operate the site in accordance with their own environmental management system, which will be included within their accredited ISO 14001 procedures.

5 CONCLUSION

- 5.1 This Sustainability Statement has been prepared by Envision on behalf of Norfolk County Council (NCC) (The Applicant) and is submitted in support of a full planning application for the creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. The RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Improvement to the existing junction between A148 Holt Road and layby accessing the recycling centre.
- 5.2 The proposed development will assist Norfolk County Council to divert increasing proportions of waste from landfill, thus working in accordance with the established waste hierarchy and Government's resources and waste strategy (2018).
- 5.3 The scheme is being brought forward in accordance with adopted sustainability policies within the Norfolk Minerals and Waste Development Framework Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (2010-2026). In particular policy CS 13, which calls for a proportion of the sites energy demand to be met by renewable energy, and policy DM11 which recognises water efficiency and the use of sustainable materials.
- 5.4 The following summarises the key sustainability aspects of the scheme in support these policies:
- The development includes a high-quality staff welfare cabin, promoting the wellbeing of staff on site.
 - New site lighting will be required to ensure safe operation. This will be designed to be highly efficient (LED type), with daylight controls and timers. Lighting will be turned down out of hours to save energy.
 - It is proposed that the reuse centre will be provided with PV panels to meet at least 10% of the site's energy demand.
 - The specification of the cabins, which are expected to be a modular building will be highly energy efficient, including LED lighting and low air tightness.
 - The scheme will include sustainable drainage and pollution control measures.
 - Landscape planting around the perimeter of the development will include native plant species that are considered beneficial to local wildlife.
 - Bat and bird boxes will be installed within the surrounding area, upon semi-mature trees within the site.
 - The site be operated by a contractor that operates an ISO 14001 Environmental Management system. Travel planning will be promoted through the provision of cycle spaces, alongside drying space and locker facilities.