

Climate Change Draft SPD Consultation – May 2022: Schedule of Responses

Ref	Name of Responder	Responder Comments	Officer Response
1	Rolleston on Dove Parish Council	<p>Rolleston on Dove Parish Council considered the above consultation document at a recent meeting and councillors raised the following queries:</p> <ul style="list-style-type: none"> ▪ It was noted that the draft SPD is heavily based on the Local Plan. The Rolleston NDP is based on the Local Plan. Will the SPD enable changes or require changes to be made to Local Plan policies? Will the SPD enable changes or require changes to be made to the Rolleston NDP? ▪ Is the Parish Council able to use any of the policies in the draft SPD during the consultation process? 	<p>(Response sent during the consultation period) Thank you for your email. I thought it would be helpful to get back to you ASAP regarding your questions to help you with your consultation response.</p> <p>Re bullet point 1) The Climate Change SPD doesn't include new policy, or change the local plan. Its role is simply to explain how existing policies in the Local Plan are to be interpreted, and give suggestions to developers how to make their proposals more sustainable. SPD's don't go through a formal examination process, so can only amount to guidance and do not carry the same weight as an adopted plan.</p> <p>Re. bullet point 2) Yes its fine to reflect the draft SPD in comments, but it's important to note in such comments that it's a draft. This means it could change before it's adopted based on consultation responses. That means at the moment it has limited weight in decision making. Please refer to the adopted version of the SPD when it is adopted.</p>
2	Stuart Bain	<p>This is a document that to me comprises a chunk of standard descriptions and a smaller sections on application to ESBC (local) As we looked and moved house during the last 3 years, and ended up with a local new build close to our old house, comments on residential design are relevant and I thought the following points for section 8 and 10</p> <p>green front gardens - some new houses have almost no front garden - maybe a strip of 1-2m, windows are so close to pavements. - the grass in a small area hardly survives due to - being full of waste material; not enough soil depth at the edges; pointing north... so a green garden of shrubs probably does better. - insufficient parking area for cars, means gardens get paved over.</p> <p>Renewables - - we have a gas boiler of course and newbuild insulated house. The gas bill has reduced from 18-19000 kWh in our last years of previous house (1985 house with original boiler) to maybe 13000-14000 kWh for a larger house (+50% area) (allowance for winter variation). It is not quite as much as I thought, given boiler should account for +25% alone. - it is a reasonable installation as a system boiler with tank, not a combi, but the control system does not allow auto compensation for outside temperature, and the water tank heating cannot have a separate temperature setting. The proprietary items that would allow this are limited for 2 zone houses. - district heating - there are complaints of price cap limitations on this, as the domestic rates do not apply. A colleague told me he offered free heat from our factory to a neighbouring new estate being built and it was not considered interesting at all. - ASHP - these are pretty ugly boxes (like air con units), and do not work well in cold weather so do not seem sensible for our country. Build a new estate with ground pipes seems more interesting and ensure house is large enough to fit the box inside a room. - solar, I saw a lot of newbuilds in Scotland with panels and have not found out if this is the regulation, or a get out that it compensates for other losses. Without storage, I don't know their local benefit. Solar water heating could be better? - wind - fitting small fast moving turbines to houses is ugly and distracting. Larger slow 3 blade turbines as in wind farms are far more pleasing.</p> <p>Design - - insulation is weak around the roof eaves, this does not appear robust and hard to maintain. - insulation in the walls is blown in, I have no idea if it filled the cavity. Where vent ducts were later drilled through, insulation fell out and left cavities. - trickle vents on windows - these really let in a lot of air in the wind direction and need jammed with paper wedges to work as trickle. They also break the acoustic seal of double glazing in a busy area. This design is really foolish. - build quality - lack of supervision time from builders and incorrect construction will affect all this. - solar gain - our new house windows are east/west and I believe benefits from heating by sun better than our previous house that was north-south. The north gardens certainly is one to avoid. As houses point in all directions in this country, is there</p>	<p>Thank you for your response. Noted. Regarding section 9, agreed- there are a number of ways that developers could use both the national design guide and the Manual for Streets to put in place new neighbourhoods that are both more walkable and green whilst reducing the necessity for car travel. Amendments to this section have been made to the SPD.</p> <p>We will look at each application and seek to enhance both its functionality in terms of active travel, and its contribution to green spaces and infrastructure. It is recognised however that for many rural neighbourhoods reliance on the car for some trips will continue, and different solutions will be applicable to different designs and locations. ESBC has also recently produced updated biodiversity guidance: BiodiversityGuidanceApril2022.pdf (eaststaffsbcc.gov.uk)</p>

		<p>something to be gained by thinking about the orientation as I have seen in other countries (it seemed)? (We chose the west point garden intentionally.) It did get really hot (29C) last summer.</p> <p>For section 9, local community -</p> <ul style="list-style-type: none"> - Stretton has some green space. Our new builds has a green ring which is fairly wide (could have made our gardens bigger). - First child will walk to local school in about 12 minutes. I really do not envy having to drive children to school. - GP clinic is a real bottleneck having to go to Branston for most occasions. - I don't understand 9.5 for restricting cars using narrow streets and close houses. Do people not want front gardens to make a residential street pretty? - People will use cars whatever restrictions; we should continue to plan this and expect they will have to commute. Winter cycling is not attractive. 	
3	HS2	<p>Thank you for consulting HS2 Ltd on the above SPD consultation.</p> <p>I can confirm that HS2 Ltd have no specific comments to make on the consultation, other than to make the Council aware of HS2 Ltd's Information Paper E27: Carbon. The Information Paper states an aim to "minimise the carbon footprint of HS2 and deliver low carbon, long distance journeys that are supported by low carbon energy" (further information can be found here https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/960807/E27_Carbon_v1.3.pdf)</p>	Noted
4	Uttoxeter Town Council	<p>On behalf of Uttoxeter Town Council, I have been requested to liaise with ESBC's Planning Policy Office to request that ESBC consider adding in 'the creation of allotments and orchards for the enhancement and benefits of biodiversity and sustainability' within the Climate Change SPD.</p>	<p>Noted and Agreed, modifications have been made to the SPD to reflect these comments. Re your specific point, you may also be interested in this recently published guidance note BiodiversityGuidanceApril2022.pdf (eaststaffsbcc.gov.uk)</p>
5	Branston PC	<p>The parish council do not have any comments to make.</p>	Noted
6	CCG – NHS	<p>As "Greener NHS" Senior Responsible Officer for the six Staffordshire Clinical Commissioning Groups (which includes your local CCG, NHS East Staffordshire).</p> <p>As an NHS Body and key contributor to the Greener NHS and Staffordshire and Stoke-on-Trent Integrated Care System (ICS) Green Plan, we welcome the Climate Change SPD and what it seeks.</p> <p>We believe that the planned moves for our local planning system to achieve developments with lower impacts on the climate are right. These will help mitigate the impacts of climate change, which as a public sector body we are strongly committed to.</p> <p>The SPD defining how existing policies in the Local Plan will be interpreted in the light of East Staffordshire declaring its Climate Change / Nature Recovery emergency over the past year strongly resonates with our wider ICS Green Plan. As the NHS remains a major public body operating within your footprint. Through our NHS Partnership Plan we remain committed to the same mutual aims of planning developments and developers reducing CO2 emissions by incorporating sustainability measures like reducing energy demand in all buildings through energy-efficient improvements to cut heating costs and incorporating renewable energy technology where possible. These are central aims of the Greener NHS Plan aimed at reducing our NHS-based carbon footprint in line with national and local targets. Therefore we fully support your proposals.</p>	Noted and agreed
7	SCC - Flood Risk Management Team	<p>I have reviewed the attached document (section 7 – water management) and I can confirm that the LLFA have no comments to make on the attached document.</p>	Noted
8	Coal Authority	<p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the East Staffordshire area there are recorded coal mining features present at surface and shallow depth including; mine entries and shallow coal workings. These features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records also indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted that this current consultation relates to a Climate Change Draft SPD and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	Noted

9	National Highways Ltd	<p>We welcome the opportunity to comment on the East Staffordshire Borough Council Draft Supplementary Planning Document - Climate Change And Sustainable Development (May 2022). It is noted that this document is designed to provide additional detail and information on the policies within the East Staffordshire Borough Council Local Plan (2012-2031). National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. Our principal interest is safeguarding the operation of the A50 and A38 SRN which route through the area.</p> <p>Based on the review of the document, we consider that it provides additional information in relation existing Local Plan and provides additional guidance on sustainable transport links, green infrastructure and walking and cycling opportunities. The draft document adheres to National Highways' policies for environmental impacts of developments as outlined in paragraphs 45, 47 and 48 of the Department for Transport (DfT) Circular 02/2013.</p> <p>Paragraph 46 of DfT Circular 02/2013 states: <i>"Where a likely negative impact on the environment resulting from the proposals occurs outside of a highway boundary as a result of the proposals (for example air quality, visual impacts, artificial light or noise impacts at new housing affected by a road), any required mitigation measures must be located outside of the strategic road network's highway boundary."</i></p> <p>We recommend that a reference to the above is included within the final version of the SPD, so that this can be considered by developers during the assessment process and to safeguard the operation of the SRN.</p>	Noted and agreed. A bullet point has been added to section 9 of the SPD
10	Tatenhill & Rangemore PC	<p>Just to confirm, the parish council discussed the above last evening. They have no additional comments to add.</p>	Noted
11	Sports England	<p><u>Green Infrastructure</u> Sport England supports the enhancement and growth of the green infrastructure network. As part of this there should be an opportunity to integrate walking and cycling routes within the network. It should be noted that where improvements to the green infrastructure networks are proposed on playing field sites, they should not impact on the ability to mark out playing pitches.</p> <p><u>Sustainable Travel and Active Travel</u> Sport England are supportive of 20 minute neighbourhoods which provides an environment for residents to be physically active within a safe environment with good walking and cycling routes.</p> <p>It is also advised that Sport England's Active Design guidance is also referenced within the document. The document sets out 10 principles about the design and adapting environments to encourage activity in resident's everyday lives, making active choice the easy choice. The document can be viewed here.</p>	Noted and agreed. A bullet point has been added to section 9 of the SPD
12	David Yorke	<p>1. Introduction and background 1.4 It is strongly suggested that the last sentence of paragraph 1.4 become a separate paragraph 1.5.</p> <p>2 Legislation and national policy It is very helpful to have the overarching legislation referred to within an ESBC-specific document.</p> <p>3 What is an SPD 3.5 It is unclear why bold text is included but it does indicate the status and purpose of this SPD.</p> <p>4 Consultation No comment.</p> <p>5 Policies in the Local Plan No mention is made of this very useful section in the Contents page but, for completeness, it must be included</p> <p>5.4 It would have been useful to see a draft version of the intended checklist at this stage, one that should refer to the specific NPPF and ESBC Adopted Local Plan, Strategic and Detailed policies concerned as well as the National Planning Policy Guidance (referred to in paragraph 6.4).</p> <p>6 Green infrastructure</p>	<p>All Sections noted – (the numbers below relate to the consultation version of the SPD)</p> <p>1 – 4 agreed</p> <p>Noted 5 (this section is in the contents page under Key Policies)</p> <p>5.4 Once the final form of the SPD is agreed the Checklist can be drafted as it will need to reflect the final document as adopted.</p> <p>6.4 this occurs in para 6.1 of the document</p> <p>7.5 now written out in full as 'Environment Agency'</p> <p>7.7 agreed, now set out at 7.8</p> <p>Section 8, 10.6 sets out principles such as conservation of heat through insulation, and ensuring that buildings manage heat appropriately. These impacts are assessed during the planning process in accordance with the Local Plan and national policy and guidance.</p>

	<p>6.4 State somewhere what acronym 'GI' means or add full title 'Green Infrastructure'. Similarly, ensure that all acronyms used elsewhere are given in full.</p> <p>6.5 Apart from restoration, also the creation of new ponds to replace those that have already been lost to previous development.</p> <p>7 Water management</p> <p>7.1 It is debatable if flooding alone is the 'most obvious effect' of climate change. Water shortages can have an equally devastating effect on the environment and existing and new developments, one outcome being ground shrinkage beneath and around the foundations of buildings, particularly earlier-built ones with shallow foundations. Any proposed fast rainwater run-off needs to be carefully considered in this regard.</p> <p>7.3 That flood risk '<i>severely curtails the options open for the growth of Burton on Trent town and similarly for Uttoxeter</i>' is not necessarily so. European countries such as Holland manage to build on flood plains successfully.</p> <p>7.4 It is essential that, as stated, '<i>development should be made safe for its lifetime without increasing flood risk elsewhere</i>'. It seems that the latter requirement has not always been given full consideration when some planning permissions have been granted. Some examples of '<i>inappropriate locations</i>' should be included.</p> <p>7.5 State what the 'EA' acronym stands for and list titles of such guidance either here or in an appendix.</p> <p>7.7 The last sentence of this paragraph should be modified as follows. '<i>SuDS provide a wide range of opportunities to maintain and enhance the biodiversity, landscape and amenity value of a site and its surroundings whilst ensuring that multiple benefits of the surface water drainage strategy are fully realised</i>'.</p> <p>7.9 '<i>Rainfall run-off attenuation</i>' is a more suitable term than '<i>rainwater attenuation</i>'. Global warming brings the latter! Also, green walls may not make a significant contribution to SuDS unless there are suitable collection systems and tanks that use gravity rather than pumped systems that require electrical energy.</p> <p>8 Renewable and low carbon energy</p> <p>Other than the need to focus on insulation and air tightness as mentioned in the RIBA's technical guide Principles of Low Carbon Design and Refurbishment referred to in paragraph 10.6, there is no other mention of the need to maximise all building's fabric insulation to minimise heat losses. This is a serious omission because it is a passive and ongoing energy reduction measure that had no dependency on mechanical and electrical systems and no running costs.</p> <p>8.2 It is absolutely critical that the energy and material resources for providing such systems are fully considered regarding their;</p> <ol style="list-style-type: none"> 1. manufacture, 2. initial installation 3. running and maintenance 4. likely economic lives before replacements are necessary, and 5. disposal of redundant components. <p>8.6 There are already some very inappropriate solar installations that have detrimental effects on land-, town- and villagescapes as well as listed buildings, conservation areas and adjoining properties. If possible, ESBC should be able to offer advice and visual control.</p> <p>8.7 Same comment on air source heat pumps as for solar technologies.</p> <p>8.8 State who is to assess the likely impact on biodiversity.</p> <p>8.9 Same comment as for solar technologies. State who is to assess the likely impacts mentioned.</p> <p>8.10 Same comment as for solar technologies. State who is to assess the likely impacts mentioned. ESBC, the Environment Agency and/or any rivers authority?</p> <p>8.11 State who is to assess the likely impacts mentioned.</p> <p>8.12 State who is to assess the likely impacts mentioned.</p> <p>9 Sustainable and active travel</p> <p>9.5 Regarding '<i>Avoiding the need for traditional traffic engineering measures by drawing inspiration from narrow, terraced and attractive streets</i>', much may depend on acceptance by the Highways Authorities and emergency services.</p> <p>State who produced the Manual for Streets and when.</p>	<p>Section 9, agreed- there are a number of ways that developers could use both the national design guide and the Manual for Streets Designing and modifying residential streets - GOV.UK (www.gov.uk) to put in place new neighbourhoods that are both more walkable and green; whilst reducing the necessity for car travel. Private car trips are the most numerous and also those that in some circumstances can most easily be saved compared with other vehicles.</p> <p>Much of the wording in this section is derived from the manual for streets, the national design guide and Sport England's Active Design Guidance, which are referred to in the SPD and give a more detailed explanation of how these principles can be implemented in individual designs.</p> <p>As a planning authority, we will look at each application and seek to enhance both its functionality in terms of active travel, and its contribution to green spaces and infrastructure. It is recognised however that for many rural neighbourhoods reliance on the car for some trips will be continue, and different solutions will be applicable to different designs and locations.</p> <p>Section 10/11 – Agreed, now listed in the energy hierarchy diagram</p> <p>Section 12 – Agreed now all policies are included</p>
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13	SCC_Planning Policy	<p>Thank you for consulting Staffordshire County Council on your Climate Change SPD. We are supportive of the principle of an SPD for Climate Change for new development to consider their contribution to reducing climate change and mitigating and adapting to its effects.</p> <p>Paragraph 5.3 directs the reader to consider other SPDs and guidance documents alongside this SPD. However, this is a little vague and would benefit from listing the relevant SPDs and guidance documents, recognising that a full list will be impractical due to new guidance coming on stream in the future that would also be relevant. It would also be helpful if the SPD could include some guidance in its interpretation for Development Management and its impact on application decisions. For example would applications be refused if they fail to meet the tests/guidance contained in the SPD?</p> <p>Paragraph 6.4 sets out the aims for Strategic Policy 23 in relation to Green Infrastructure (GI) and how they could be achieved. It is felt that this section is a little vague and could be open to interpretation and confusion. It is not clear from the SPD exactly what would constitute GI and whether all green spaces would be considered as GI, for example are SUDs and highway verges to be considered as GI?</p> <p>The final bullet point in paragraph 6.4 mentions <i>'tree lined streets'</i> as per the recent update to the NPPF and National Design Guide. The County Council is presently considering the implications of incorporating street trees on new roads and will update the Local Planning Authorities in due course. For now it is worth noting that if trees are to be incorporated within land that will be put forward for adoption by the highway authority it is not possible to plant them within a standard 2m wide footway. Therefore, incorporation of trees will require a wider highway corridor. It is also worth noting that mature trees can have large canopies which can in certain circumstances reduce the effectiveness of streetlights. This may result in more street lighting columns being required to safely light a street, which means more resources are needed to produce the actual lighting columns in the first instance and more electricity required to power them. Without careful consideration of tree type, spacing and lighting design the incorporation of street trees could actually have a negative effect on carbon emissions.</p>	<p>All comments noted. (the numbers below relate to the consultation version of the SPD)</p> <p>Re. 5.3, agreed. Additional information and link added to the SPD at section 5. Re further guidance for Development Control teams, this will come as a part of the checklist to be included on adoption.</p> <p>Agreed, The SPD itself amounts to guidance, however some of the requirements where separately referenced are either local plan policy or national policy or legislation. (revised section 3 in the SPD sets this out)</p> <p>All green spaces can contribute towards the Borough's green infrastructure, which could include verges and SuDS where they incorporate green space. For a more detailed definition of GI please see 3.165 of the Local Plan and Annex 2 of the NPPF.</p> <p>6.4 Tree Lined Streets- Noted, and 6.5 Noted, and agreed. Section 6 of the SPD has been amended to make reference to high quality design and the requirements of that policy include surveillance and context etc.</p> <p>Whilst it is beyond the scope of the SPD to give guidance on each of these potential circumstances; each proposed development will need to be determined based on the Local Plan and national policy and</p>

Paragraph 6.5 talks about 'smaller scale developments'. It would be useful to understand within the SPD what parameters are being used to define a 'smaller scale development'. With regards to the wish to see green front gardens there are concerns over how this could be interpreted and its potential effect on off-street parking. Could it lead to provision of more rear parking courts if frontage car parking is effectively discouraged by the SPD? Staffordshire County Council have concerns with regards to the effectiveness of rear parking courts as there are examples within the county where they are rarely used due to poor natural surveillance and distance to residents front doors. As a consequence, on-street parking has become a problem in these locations. If parking cannot be at the front of a dwelling it could also have implications for EV charging.

Section 7 Water Management, we support the signposting of developers to the County Councils SuDS Handbook as this contains the most appropriate guidance for SuDS and there would be no need to replicate its contents in summary form or otherwise in this SPD.

Paragraph 8.3 Describes 'District Heat Networks'. We are supportive of the principle, but the SPD should make it clear that where such networks are being considered that may include the placing of apparatus under the highway early engagement with the Highway Authority would be required.

Paragraph 9.3 asks applicants 'to consider whether the location and design of a scheme will allow people to meet their everyday needs within a 20- minute walk or cycle.' It is unclear what would constitute 'everyday needs' and that the SPD should provide further detail on what facilities fall within the definition of 'everyday needs'.

Paragraph 9.5 contains a bullet point list of things to be 'considered' when developing a scheme to achieve sustainable and active travel goals. It is unclear from the SPD whether the list is in priority order or if it is merely a list of matters that should be considered? It is also suggested that as the majority of matters considered here relate to highways design that they would be better placed in a Design Code rather than an SPD pertaining to Climate Change.

Notwithstanding the point on Design Code we offer the following comments to the bullet points listed under Paragraph 9.5 but would caveat further that should section 9.5 be considered for inclusion in a final SPD detailed liaison with SCC highway officers will be required beforehand:

- *Incorporate traffic tree or traffic calmed routes.* We believe the word 'tree' should read 'free'. Would a "calmed street" still require segregated footways or are we into shared use surfaces?
- *Avoiding the need for traditional traffic engineering measures by drawing inspiration from narrow, terraced and attractive streets.* It is unclear what is meant by 'traditional traffic engineering measures'. We are not convinced that narrow terraced street will not cause a highway safety issue for example or would provide for segregated features for pedestrians/cyclists.
- *Constrained street widths consistent with Manual for Streets.* Every road should be designed for the level of traffic it is expected to carry. A constrained street width will not allow a bus service to penetrate a housing estate for example. This statement needs more thought and greater clarity of what is being requested.
- *Short street lengths, responding to changes in building line.* Please define 'short'. Any length of street should make sure that sufficient off-street parking has been designed into a scheme to make sure that larger vehicles such as refuse lorries and buses can negotiate the network. If sufficient off-street parking is not available for residents, this will result in on-street parking problems and larger vehicles such as refuse/delivery/buses cannot negotiate the highway.
- *Reduced forward visibility through arrangement of streets.* We are happy with the concept, but forward visibility must still be in line with national guidance (Manual for Streets).
- *Visual narrowing of carriageways through edge treatments.* Please define what type of edge treatments you are thinking off? If you are considering the use of boundary walls on private land close to the rear of the adopted highway, this can affect vehicular visibility and can be a highway safety issue.
- *Buildings close to footway, without large setbacks.* We do not have an issue with this concept as long as there is sufficient space to provide charging facilities for electric cars whilst maintaining visibility from any driveways and forward visibility around the internal roads of a development.
- *Avoiding cul-de-sacs and providing well connected and legible streets with designs that respond to their function.* We are happy with the concept, however, please see our comments to Paragraph 9.6 below which relates to designing out crime. This contradicts the bullet point that states "Incorporating 'no-through streets' for cars in residential areas, with prioritised access for people walking and cycling"
- *Providing car clubs and reduced levels of car parking in locations where car ownership may be low, and public transport opportunities can be maximised Incorporating 'no-through streets' for cars in residential areas, with prioritised access for people walking and cycling.* Car clubs are a very difficult concept to make work as they often need larger development or even the whole of Burton or Uttoxeter. They are also expensive to operate. Would it not be better to have a preferential rate with a local

guidance. This will include the quality of the individual design, layout, and the impact on the street scene, taking into account all these factors.

Section 7, noted

Section 8, 8.3 agreed – additional wording added to section 8 of the SPD

Section 9, 9.4 This will depend on the circumstances of each proposal, and therefore is included here to give a general guide. In urban and rural areas there will be differences in the services which can be reasonably accessed through active travel in a reasonable time. More information on 20 minute neighbourhoods has been added to section 9.

Paragraph 9.5: Local authorities will need to create Design Codes under the measures proposed in the Levelling Up and Regeneration Bill 2022 currently going through parliament. For ESBC this would likely come as part of a plan review.

The Climate Change SPD isn't intended as a design code, but as a set of measures which could enhance the sustainability of schemes and so should be considered when proposing development. Clearly not all these options will be right for every scheme, but the intention is that developers think broadly about how to improve the sustainability and ability of residents within schemes to use active travel while developing proposals. This makes it clear that these objectives are important to have reflected on before applications are submitted, to ensure that they are compliant with the Local Plan, especially strategic policy 28 and Detailed Policy 2.

Agreed, Section 9 has been re-written to make this clearer. The wording of certain bullet points has been added to and revised. Section 9 has been amended to reflect the value of liaison with County Highways early on in the planning process.

		<p>car hire firm? With regards to the text which states '<i>in locations where car ownership may be low</i>', we recommend the word 'locations' be changes to 'types of development' as car ownership is not always determined by the location.</p> <ul style="list-style-type: none"> · <i>Providing dedicated traffic-free walk and cycle routes to key destinations such as schools, shops and leisure facilities.</i> What about routes to employment & transport interchanges? Local Transport Note 1/20 states that segregated cycleway / footways should be the norm which goes against your concept of narrow or constrained roads as these segregated facilities may well take up 3-4m of space alongside the road. Would it not be worth considering low trafficked roads (which may include cul-de-sacs) you consider allowing cyclist to ride on the road rather than having a dedicated ped/cycle facility throughout the whole development? Maybe a mix of features is required but whatever is decided, it needs to be proportionate to the development. · <i>Providing safe, secure and convenient cycle parking in residential development, as well as in key destinations.</i> We suggest you add car charging to this list. Manual for Streets recommends suitably sized garages or a shed in garden can accommodate bicycles. With regards to 'key destinations', we suggest you clarify what you expect to be provided in these locations. Also please clarify your definition of "secure". · <i>Particular consideration should be given to the need for secure storage of electric bikes and charging points.</i> What about charging facilities for electric cars? In mixed use developments, have you considered more secure facilities within commercial buildings to encourage people to cycle to those locations? You need to clarify if you are referring to residential or commercial sites, or maybe both. Finally, what about secure storage for normal bikes or scooters? · <i>Supporting enhanced bus frequencies and off-site priority measures, such as priority at signals and bus lanes, from day one of occupation.</i> Support in principle however, with regards to having enhancing bus frequencies from day one of occupation, this is not a sustainable policy. Bus services are expensive to operate and there will not be enough residents on a new housing estate to cover the costs of running a bus service through the site. All enhanced bus services are generally procured via a monetary contribution secured via a s106. This is a finite sum of money and you run the risk of the pot of money running out to run the bus service just at the time a substantial level of residents are living on the site. If a bus operator has not attracted enough passengers to financially continue to operate the service themselves when the s106 monies run out, the service will be withdrawn and the residents of a new estate will not be able to benefit from using public transport. Staffordshire County Council as the public transport authority will determine when any new or uplifted bus service is to operate in order to maximise the benefit to any new residents and to make sure the s106 is used effectively to maximise the benefit. We therefore object to the wording 'from day one of occupation'. It may also not be practical to physically drive a large commercial bus into a site from day one of occupation as the vehicle cannot reverse whilst in service and would therefore require turning facilities. Raised manhole covers can also be problematic and uncomfortable for operators/passengers. <p>In relation to bus priority measures we are supportive in principle however consideration is required to where and when these are implemented. With regards to bus lanes and bus priority measures, these features can hold up general traffic and cause other issues such as air quality problems as the free flow of traffic is disrupted. It can also have a knock-on effect of motorist's rat running along parallel streets to avoid the queues generated by the bus priority measures. We seek further clarification as to where are these bus priority measures are to be implemented – are they to be within developments or are you considering a financial contribution being taken from a developer to build off-site priority measures in the vicinity, or both?</p> <ul style="list-style-type: none"> · <i>Delivering bus priority within sites, and work with bus operators to ensure the geometry of routes is suitable and stops are well located and designed</i> – Staffordshire County Council have their own policy which states that residents need to be within 350m of a bus stop. By narrowing or constricted roads will not allow a bus to penetrate. This bullet point also contradicts the first two bullet points in this list. A swept path analysis of the roads to be provided within an estate will prove if a bus can safely navigate them or not. <p>Paragraph 9.6 - States that '<i>all of the above (bullet points) should be undertaken with a view to ensuring that both crime and the fear of crime is designed out as much as possible, to ensure that walking and cycling are safe and enjoyable.</i>' Our experience has shown that cul-de-sacs and other no through routes can be a positive feature to discourage crime as vehicles or pedestrians had no escape routes if being pursued by the police. By having a well-connected development, it can create escape routes and hinder law enforcement.</p> <p>Finally, another element to aid climate change within new developments would be for the SPD to include guidance on the preparation and implementation of Travel Plans to encourage sustainable modes of transport.</p>	
14	Wootton PC	We are much in favour of all the suggestions in your document. Anything which can help the present crisis should be implemented as soon as possible.	Noted,
15	Brizlincote PC	They would just like to add the following comments please:-	Noted, the SPD has been amended to include additional text on EV charging points in section 9, and building regulations now require these for new residential and some commercial buildings. Policy for the disposal of foul sewage is set out in ESBC Local Plan Policy SP27 and,

		"There is no mention in the document about the provision of Electric Vehicle Charging Points for new building housing and commercial premises. There is also no direct mention of the control and reduction of raw sewage discharge into our watercourses".	depending on the circumstances, is regulated by the Environment Agency, the Water Services Regulation Authority and other legal controls.
16	Historic England	<p>Many thanks for consulting Historic England on the above consultation. Historic England are supportive of a Climate Change SPD and are preparing additional research and advice relating to climate change and the historic environment, which is due out next year.</p> <p>The following link provides some detail on why responding to climate change is so important and considerations for the historic environment. https://historicengland.org.uk/research/current/threats/heritage-climate-change-environment/</p> <p>Section 7.7 discusses the role of SUDS, which we recognise are an important element of a development. We would welcome recognition of the need to consider the impacts of this type of development on the historic environment, heritage assets and their setting and detail within the document on how to manage this issue with regards to appropriate siting and materials. Further, as will be relevant with all topics within the SPD; we would welcome a section on climate change considerations and the historic environment. There will be examples where climate change mitigation and renewable energy technologies are inappropriate for the historic environment, for example, wind farms in the setting of heritage assets or solar panels located on sensitive areas of heritage assets. There will also be examples where mitigation measures such as flood alleviation strategies may have consequences for heritage assets, such as water logged archaeology for example.</p> <p>There are a wide range of issues to consider and a section on the historic environment within this document could assist in setting out how to deal with these issues. This could also refer to the need for listed building and scheduled monument consent being required for certain development.</p> <p>It will also be the case that climate change mitigation will have the potential to be beneficial for the historic environment through such issues as preventing flooding to heritage assets and we would be keen for the document to consider what opportunities there may be for heritage and climate change. Paragraph 8.8 for example, could also reference the need to appropriately mitigate heritage issues. We note within paragraph 8.9 there is a reference to the historic environment within the context of wind development and we welcome this. However, we do consider that there needs to be a thorough consideration of the relationship between this SPD and the historic environment through its own section within the document</p>	Noted. Agreed, new text added to section 6. Although the historic environment isn't the focus of this SPD, the key requirement to be in compliance with local plan policy, and national policy and guidance in this area are reinforced by this text addition.
17	Christopher Dodds	<p>1. Guidance v Legislation The introduction to the document asserts that the "SPD, once adopted, will be material consideration in the determination of planning applications" but later states that the policy can be used to "provide guidance" and that low carbon technologies should be "encouraged". A reliance upon guidance and encouragement as opposed to legislative measures (through Building Regulations) is unlikely to achieve the desired targets. Deployment of solar technologies, permeable paving or other virtuous solutions will not be readily adopted by developers. A scheme that links the policy's developed technologies to the introduction of legislation is required to drive conformance.</p> <p>2. Resource & Enforcement Significant resources are required to successfully position policy and enforce legislation. For ESBC, there are similar policies and legislation to protect conservation areas but there is widespread non-compliance. This is largely due to insufficient resources. For example, there is one Conservation Officer providing assistance one day per week for the whole of Staffordshire and services such as pre-planning advice are currently suspended. Climate Change SPDs will become as ineffective as Conservation SPDs without appropriate resourcing. Council workforce plans that adequately support the application of climate change policies and associated legislation are required.</p>	Noted. SPD's role in the planning system mean they can't create new policy, but they can give guidance and advice on the implementation of existing policy, see section 3 of the SPD for a more detailed explanation. Changes to building regulations are outside the scope of planning, although the government have recently made changes to building regulations to include further sustainability measures.
18	Horninglow & Eton Parish Council	<p>Horninglow & Eton Parish Council, the planning committee and the full council, have authorised me to send in the following approved response to your Climate Change draft SPD consultation.</p> <ol style="list-style-type: none"> 1. We broadly welcome the many excellent recommendations in this draft of the Climate Change Supplementary Planning Document. 2. Many of these proposals could be incorporated and emphasised in the next, or revised, Neighbourhood Plan for Horninglow and Eton. 	Noted. SPD's role in the planning system mean they can't create new policy, but they can give guidance and advice on the implementation of existing policy, see section 6 of the SPD for a more detailed explanation. 3 – 6 Noted, changes to Local Plan policy can only be furthered through a local plan review, but the views expressed should be re-iterated in the future, during any consultation on a revised Plan.

		<p>3. Whereas it is good that such an SPD could be a “material consideration” in planning decisions (3.3) it is unfortunate that the SPD will not impose targets or standards on new developments (3.5 - 3.6).</p> <p>4. We welcome that the SPD is favourable towards community and micro-generation opportunities (8.1) and suggest that new developments should be required to build-in such systems or as a minimum make there subsequent installation easier and more efficient - for example roof structure and alignment to maximise PV panel efficiency.</p> <p>5. We suggest that ESBC might also like to join other councils in calling for the adoption of a “Local Electricity Bill” in order to support the creation of community micro-generation.</p> <p>6. We are not in favour of biomass boilers (8.11) with their unavoidable consequence of creating unnecessary CO2 emissions and likewise are surprised that ESBC Strategic Policy 28 encourages the development of a “local wood-fuel market” in spite of the contradiction this makes to the aim of reducing pollution.</p> <p>7. We note (in relation to item 10.6) that there is no mention of the RIBA’s recommendation (July, 2021) for minimising total CO2 production by avoiding demolition in favour of refurbishment wherever possible, and suggest that recommendation should be included in the final version of the SPD.</p>	7. Agreed. New text added in section 10
19	Tutbury PC	<p>Three SPD points were considered by the parish council.</p> <p>* Reduction of carbon emissions in new development proposals:</p> <p>* Reduction of energy demand in buildings:</p> <p>* Renewable energy technology;</p> <p>Local Authorities can only insist that development is carried out in accordance with rules laid down by Parliament, they have no enforcement powers beyond those rules. The building industry has many Acts and Regulations intended to control the quality of buildings, enforcement of even those few rules is patchy and there are many examples of failure to protect building users. The private sector does not know best when it comes to control of design changes necessary to save our planet.</p> <p>New buildings, most particularly new houses are not built to seriously control heat loss or to apply modern technology. Floors, roofs, walls, windows and doors can all be improved by simple design and/or material change, but they are not and ESBC cannot change that. What they can do is train (and employ) sufficient qualified staff to oversee all current building control responsibilities.</p> <p>Existing rules represent minimum standards which would be improved by immediate changes to Building Regulations, but without the political will to force necessary change any improvement will be slow and too late to stop environmental decline.</p> <p>ESBC should join with other authorities to insist that standards are raised and require that all new buildings are `fit for purpose` before they may be used, or continue to be used.</p> <p>Deterioration in the quality of air occurs in many new houses which have no alternative ventilation system other than openable windows.</p> <p>Return rainwater systems could be used to flush toilets rather than use drinking water. Solar heat capture panels could be mandatory on all new buildings. Walls and roofs can be constructed to capture heat and protect against heat loss.</p> <p>The one outstanding factor that all planning authorities can and should control is open countryside development. ESBC proposed far more houses than was shown by the needs analysis when it prepared for what is now the East Staffordshire Local Plan. Tutbury Parish Council joined with other parish councils at the time to oppose ESBC growth plans- without success. The lesson learned there was that national political policy and local canvassing produces a new build figure for new house building far beyond the growth history of local development or of proven need. The result can be seen around those villages that opposed the ESBC plan; and still nothing gets done about using brown field sites first. No attempt is made to prepare for age related need in all homes or to ensure sufficient level sites with ready access and straightforward conversion for disability.</p> <p>Without countryside protection and wild places there can be no control of climate, no control to the loss of species and no slowing of the inevitable heating of the atmosphere. Rivers will continue to be polluted and the seas of the world will die. Without governmental control and investment nothing will be achieved. The future we hand on to those who follow us will be bleak. ESBC should join with other planning authorities and demand firm regulations that will deter profit seekers from stopping those changes the whole world accepts as immediately necessary.</p> <p>The use of energy to make goods, the use of tidal power, wind power and construction technologies not yet developed will eventually help but are beyond the scope of a parish council response to a climate change supplementary planning document. Everyone knows that oil, gas and coal usage all continue to produce carbon dioxide in vast quantities yet those groups who promote their use are free to canvass political leaders, make political financial donations and hold back policy change. It is unthinkable that anyone would want to do nothing about such a profound problem as global warming and the necessary legislation is beyond the scope of local councils, but with pressure from the whole nation Parliament may yet enact laws necessary for enforcement, only then will developers respond by changing the technology of construction design and process.</p>	<p>Noted. SPD’s role in the planning system mean they can’t create new policy, but they can give guidance and advice on the implementation of existing policy, see section 3 of the SPD for a more detailed explanation. Changes to building regulations are outside the scope of planning, although the government have recently made changes to building regulations to include further sustainability measures. ESBC has also recently produced updated biodiversity guidance: BiodiversityGuidanceApril2022.pdf (eaststaffsbc.gov.uk)</p>
20	Environment Agency	<p>The Environment Agency has the following comments to make on your draft ‘Climate Change and Sustainable Development’ SPD. The recommendations below will help steer development to mitigate and adapt to the impacts of climate change when considering the water environment.</p>	<p>Noted: agreed- new wording has been added to section 7 of the SPD. Staffordshire County Council is ESBC’s relevant LLFA, and have been consulted as part of the development of this SPD.</p>

Flood Risk

We have reviewed the 'Water Management' section of the SPD. Flood risk is likely to exacerbate in light of the impacts of climate change as identified in paragraph 7.1. This section should be expanded to give more details on the types of measures that will allow for better water management and adapt to the impacts of climate change.

Strategic Policy 27 of your adopted Local Plan states the following:

“Proposals in flood risk areas, or proposals which would affect such areas, will only be permitted where they would not cause unacceptable harm to the following interests:

- i *i. The protection and storage capacity of the flood plain, washlands and other areas at risk from flooding;*
- ii *ii. Access to watercourses for maintenance;*
- iii *iii. The characteristics of surface water run-off;*
- iv *iv. The integrity of fluvial defences;*
- v *v. The drainage function of the natural watercourse system; or*
- vi *vi. The necessity for additional public finances for flood defence works.”*

Any new development or works that take place should have a positive effect on flood risk and the conveyance of water throughout the channel. Opportunities to reduce flood risk should be explored in all new development proposals and ensure designs are appropriately flood resistant and resilient.

We strongly recommend the inclusion of the following within Section 7 to support Strategic Policy 27, “land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme the developer will be expected to contribute towards the cost of delivery and/or maintenance of that scheme”. This approach is supported by 161 of the National Planning Policy Framework.

Consideration should be given to identifying opportunities to remove development from floodplains through land swapping to maximise natural storage of flood water, reduce flooding problems and increase landscape, ecological and conservation value.

We recommend that Warwickshire County Council as the Lead Local Flood Authority (LLFA) are consulted on this SPD. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water. However, in our Strategic Overview role we welcome the inclusion of SUDS to reduce surface water runoff, improve water quality and improve local amenity value.

Easement

It should be recognised that even in defended areas there will always still be a degree of residual risk if flood defences are overtopped or breached by a flood event greater than that for which the defences were designed. As climate change increases the frequency and severity of flooding this brings increased maintenance requirements of maintaining channels and flood defences.

Development should therefore maintain an 8m easement between development and the top of the bank of watercourses and the toe of flood defences to allow for maintenance and inspection requirements. The Environment Agency strongly encourages greater buffers (20m) as standard to allow for access to larger maintenance works, to minimise future impact on flood flow routes, and to account of the natural movement of watercourses during a developments lifetime.

Climate Change Allowances This document should draw a developer’s attention to the latest climate change allowances to assess flood risk (both fluvial and surface water) which is available on the following website: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

Stilts and voids

The use of slits and voids to mitigate the impacts of climate change from a fluvial flood risk perspective on new development is not appropriate. Areas under stilts are often used as storage spaces and have the potential to become blocked during flood events which will have a cumulative impact in terms of flood risk. Therefore, we recommend including a section within the SPD discouraging the use of stilts in the design principles for developments at risk of flooding.

River Channels and Blue-Green Infrastructure

We recommend further emphasis on blue-green corridors as they provide multiple benefits to areas including services such as climate change mitigation/adaptation, flood management provision, green space, cooling local temperatures, ecological function and some amenity. There are multiple ways of delivering this outcome, which include but not limited to; re-connecting flood plains, planting trees on riverbanks to increase shading and species connectivity, creating areas of wet woodland, introducing wetland vegetation, weir removal, SUDs and Natural Flood Management. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure.

Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This could be integrated with the 8m easement required as discussed in the “Flood Risk” section above.

We also strongly recommend the inclusion of the following, “developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground

Noted: agreed- new wording on climate change allowances added to section 7 of the SPD

Noted: agreed- new wording added to section 7 the SPD

Noted: The use of slits and voids to mitigate the impacts of climate change. Agreed- new wording added to section 7 of the SPD

Noted: Naturalised watercourses. Agreed- new wording added to section 7 of the SPD

Noted: Water Availability, Agreed- new wording added to section 7 of the SPD

Noted: GSHP Agreed- new wording added to section 8 of the SPD Regarding other identified technologies, these are less likely to come up in everyday circumstances, and so the advice of the agency will be sought in each relevant case and the applicant signposted.

Noted: Abstraction Licencing- Agreed – new wording added to section 8 of the SPD

culverts, to provide biodiversity net gain as well as amenity improvements". The River Basin Management Plans provide additional detail on de-culverting and the creation of naturalised watercourses should be referenced in this section. If green spaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential in relation to the impacts of climate change. This can also be incorporated into the surface water management of the site. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.

We remind LPAs of their regulation 33 (WFD Regulations 2017) duty to have regard to River Basin Management Plans (RBMPs) when preparing policies and making decisions on individual applications.

When undertaking the development of a site, or the proposed development of a site, an assessment should be made to:

- identify when there might be impacts on water bodies;
- seek options that reduce impacts on water bodies;
- assess the risk of deterioration or failing to improve water bodies;
- require all practicable mitigation;
- prevent deterioration of current water body status;
- take listed measures in RBMPs into account;
- consider alternative development options that would avoid or reduce impacts on water bodies;
- seek opportunities to improve water bodies; and
- consider objectives in RBMPs for protected areas.

Water Availability

The impact of climate change on water resources is projected to increase pressures on water availability. In July 2021 Defra announced that South Staffs Water and Severn Trent Water's supply regions are now considered to be in "serious water stress" for the purposes of water resource planning. This allows the companies to consider compulsory customer water metering as part of its next Water Resource Management Plans. Further information is available at:

<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>.

Guidance indicates that primary sources of evidence which might support a tighter water efficiency standard for new dwellings include the Environment Agency 'Water Stressed Areas Classification (2013)' which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand. Please note, this link is to previous water stressed areas classification from 2013, and is in part now superseded by this latest July 2021 update.

Further to the above, we publish licensing strategies on Gov.UK which sets out water availability and strategies for water management areas: <https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process>.

We recommend expanding Section 7 to include water efficiency measures reducing the demand on water resources. Water efficiency in new buildings is encouraged to reduce water use and cut domestic carbon emission and those from the treatment of water.

Groundwater Source Heat Pumps

Ground Source Heat Pumps (GSHP) do utilise a renewable energy source, at least in the long term, as it is the warming of the ground by solar radiation that keeps 'shallow' groundwater at its constant temperature. Heat from deep in the earth's interior can warm groundwater but this is not normally significant within 100m of the surface.

GSHP systems can be used for heating or cooling and are in principle energy and CO2 efficient. However, unless they are managed carefully there is the potential that the ground and groundwater can eventually warm or cool to a point where the system cannot continue to operate efficiently, or at all. Adjacent systems may also interfere with each other. The system operator should also consider potential for loss or damage to third parties.

Key issues:

- Risk of the pipes or borehole(s) creating undesirable connections between rock or soil layers. This may cause pollution and/or changes in groundwater flow and/or quality.
- Undesirable/unsustainable temperature changes in the aquifer or dependent surface waters.
- Pollution of water from leaks of polluting chemicals contained in closed loop systems.
- Pollution of water from heat pump discharge from an open loop system that contains additive chemicals.
- Impacts of re-injection of water from an open loop system into the same aquifer, both hydraulic and thermal, as well as any water quality changes induced.
- The potential impact of groundwater abstraction for ground source heat systems on other users of groundwater or surface water.

		<p>We expect developers to undertake appropriate prior investigations for these systems. This should include environmental risk assessment and method statements for the construction and operation of the systems. These may be provided as part of the planning process. Please also note that a GSHP system may require an abstraction licence and a discharge permit from us. There is no guarantee that these will be granted.</p> <p><u>Water Source Heat Pumps</u> Water Source Heat Pumps may require an abstraction licence, discharge permit and flood risk permit from us. There is no guarantee that these will be granted. Therefore, we strongly advise recommendations to contact the Environment Agency in the first instance in relation to such proposals. More information on the permits required for both ground source and surface source systems is available here: https://www.gov.uk/guidance/open-loop-heat-pump-systems-permits-consents-and-licences.</p> <p><u>Hydropower</u> We support the development of sustainable hydropower schemes and are committed to helping the UK generate more power from renewable sources. However, hydropower schemes can be complex and need to be designed and managed carefully to avoid unacceptable impacts on fish, the water environment and communities. Hydropower schemes require a number of permits and consents from us. We have to take water resources, fisheries and flood risk management issues into account. There is a complex process that developers have to go through to obtain the necessary permits from the Agency, with no guarantee that a scheme can be licensed - we have to be sure that any scheme will not adversely affect the water environment. More information on the permits required is available here: https://www.gov.uk/guidance/new-hydropower-scheme-apply-to-build-one.</p> <p><u>Abstraction Licences</u> If water is required, then depending on the source of water and volumes required, they may require abstraction licences from us. A licence must be in place before abstraction takes place. It can take up to 4 months from receipt of a valid application for a licence to be issued. There is no guarantee that a licence could be granted as it is dependent upon water resource availability. Any licence issued could contain conditions requiring abstraction to cease at times of lower flows. Information on how to apply for licences is available on our website at www.gov.uk.</p> <p>Conclusion Should you have any queries regarding the above comments please contact for further advice.</p>	
21	Natural England	<p>Natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Climate change is therefore central to Natural England's work.</p> <p>Natural England's key focuses in terms of climate change are:</p> <ol style="list-style-type: none"> 1. Nature based solutions (NbS) to contribute to meeting 'net zero'. Tree planting and peatland restoration are the biggest opportunities however, many habitats and ecosystems can contribute to carbon storage and sequestration 2. Nature based solutions to reduce risks to people from climate change (often termed Ecosystem-based Adaptation), for example natural flood management and urban cooling from green infrastructure. 3. Building the resilience of and accommodating change within the natural environment by restoring natural processes and habitats. 4. Adapting conservation objectives for designated sites and management techniques to adjust to changes that have already happened or are inevitable. This is to ensure these sites, their habitats, species, or geological features can adapt to inevitable changes <p>Comments on the SPD: In recognition of our key climate change focuses Natural England offers comments on those aspects of the SPD with direct or indirect links to the climate change impacts of development on the natural environment and on nature-based solutions. We welcome the SPD and note the inclusion of green infrastructure and water management which we provide advice on below. We advise that it would be useful to include case studies demonstrate themes and issues. We are aware that Cheltenham Borough Council have done this in their recent draft Climate Change Supplementary Planning Document.</p> <p>Green infrastructure Green infrastructure proposals should take into account, and be resilient to, the impact of climate change and include natural solutions/measures to alleviate the impact of climate change, e.g., through carbon sequestration, natural flood/surface water management, helping with urban cooling and provision of SUDs, microclimate adaptation etc.</p>	<p>Noted: Green Infrastructure, nature recovery strategies, and restoring natural systems agreed- new wording added to section 6 of the SPD</p> <p>Noted: Part 4 of the Climate Change Adaptation Manual. Agreed- new wording added to section 6 of the SPD</p> <p>Noted: Water Management- Agreed – the value of SuDS in relation to water quality is picked up in section 7 of the SPD, and in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook</p>

		<p>Part 4 of the Climate Change Adaptation Manual provides information and examples of climate change adaptation via green infrastructure.</p> <p>We advise that your authority consider the role green infrastructure can play in enabling species to move from less favourable habitats to more favourable ones as the climate changes. Green infrastructure can be part of an overall nature recovery network. Advice on nature recovery networks can be found here: Nature Networks Evidence Handbook (NERR081). The local approach to green infrastructure should be informed by the forthcoming Local Nature Recovery Strategies (LNRS) Local Nature Recovery Strategies (LNRS) which will set out what sort of habitats/features are priorities for an area and in what locations.</p> <p>The natural environment can play a vital role in tackling the climate crisis as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation. Alongside many other negative impacts, the destruction and degradation of natural habitats has resulted in the direct loss of carbon stored within them. Restoring natural systems can start to reverse this damage at the same time as supporting and enhancing biodiversity, alongside delivering co-benefits for climate change adaptation, soil health, water management and society. Green infrastructure proposals should seek to restore degraded natural habitats where possible. Further information on carbon storage and sequestration by habitat can be found here.</p> <p>Water management</p> <p>We would advise that water management should include measures to ensure good water quality as well as focusing on flooding. There may be opportunities to retrofit SUDs in some areas which would be beneficial in terms of flooding, water quality and biodiversity and your authority may wish to explore this further.</p> <p>Other advice</p> <p>We are aware of the below guides and standards which you may find useful:</p> <ul style="list-style-type: none"> • TCPC-Report: The Climate Crisis – a guide for local authorities on planning for climate change https://www.tcpa.org.uk/planning-for-climate-change • TCPA Practical Guides - Guide 14: Building climate resilient large-scale new communities https://www.tcpa.org.uk/tcpa-practical-guides-guide-14-building-climate-resilient-large-scale-new-communities • Building with nature • First Steps in Urban Heat for Built Environment Practitioners http://epapers.bham.ac.uk/3452/ • Overheating for homes- https://goodhomes.org.uk/overheating-in-new-homes • Forest Research- Urban Tree Manual • Designing Blue Green Infrastructure (BGI) for water management, <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	
22	JLL on behalf of Nurton Developments Ltd (Nurton).	<p>We write on behalf of our client, Nurton Developments Ltd (Nurton). Nurton are the promotor and master developer of the successful Branston Locks mixed use development – the largest such development in the adopted Local Plan.</p> <p>Nurton welcomes generally the initiatives set out in the draft SPD. However, it does consider it is important that the guidance and advice it contains should not be applied indiscriminately or slavishly.</p> <p>A good example is the proposed initiative of “tree lined streets”. This is set out in the last bullet point to paragraph 6.4 of the draft SPD. The reference to “ tree lined streets” refers to National Planning Practice Guidance. Guidance is also provided in the NPPF in paragraph 131. For ease of reference, I have cut and pasted this paragraph below.</p> <p>131. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵⁰, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.</p> <p>Footnote provides an important caveat. It states: -</p>	Noted

		<p>⁵⁰ Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.</p> <p>This is particularly relevant with Branston Locks.</p> <p>Condition No. 5 of the outline planning consent (Planning Application Ref. No. P/2012/01467) states that the development permitted under the outline consent, granted in April 2015, should be carried out substantially in accordance with the approved Land Use Parameters Plan (Rev 13) and the approved Design Guide (Rev 19). The Design Guide, the latest version of which was produced in October 2020 and approved subsequently, establishes a hierarchy of street typologies (8 in total). Essentially, the design of the streets for any proposed development at the Branston Locks site is directly linked to this hierarchy of streets.</p> <p>The Design Guide advises primary boulevards should be dual tree-lined, secondary avenues should be single tree lined and all lower tiers should have incidental tree planting only. The rationale for this is to increase the legibility of the development, utilising tree planting as a tool for indicating more important streets (i.e. those streets that will lead you in, out, or to the centre of the development). If tree lined streets are provided in third tier street areas, this key legibility street feature would be lost/undermined. Providing tree lined streets in inappropriate areas may result in negative implications around overall street width, enclosure ratios that link to pedestrian/cycle comfort and traffic speeds. It is to be noted that Branston Locks is also providing large areas of tree planting within the generous areas of structured Green Infrastructure as well as park area to the ridge (circa 70 acres). As part of the National Forest requirements, a significant number of new trees have been planted or have been designed in.</p> <p>The outline planning consent granted in April 2015, and the requirements of Condition No. 5, cannot be overridden by national or local planning policy that has been adopted subsequent to the granting of the consent. The same applies to other elements of the SPD. Due consideration will need to be given to ensure that the development continues to be guided by the approved Design Guide, the Land Use Parameters Plan, and other aspects of the extant consent. These include approved strategies on transportation, drainage, open space and protected species mitigation as required by other conditions to the outline planning permission.</p>	
23	The National Forest	<p>The document appears to be at an early stage of its development. The overlap between the various sections is not always apparent and the NFC considers these overlaps should be signposted throughout the document. At this early stage, the document is lacking in examples and imagery, both of which will enrich the document and make it more understandable and relatable for the reader.</p> <p>5. Policies Paragraph 5 provides a list of Local Plan Policies which the SPD intends to provide guidance on. Strategic Policy 26: The National Forest has direct and inextricable links to the policies in this list but is not included. The NFC consider its inclusion in this list would be beneficial.</p> <p>Should the LPA not consider this to be appropriate, the NFC suggests that the correlation between the objectives of Strategic Policy 26: The National Forest should be included throughout the document in a similar manner to paragraph 6.2 which references Strategic Policy 29: Biodiversity and Geodiversity.</p> <p>6. Green Infrastructure The NFC considers that Strategic Policy 26: The National Forest should be referenced within the Green Infrastructure (GI) section, noting this policy seeks to integrate existing GI and make connections with on-site or adjacent woodlands and other habitats.</p> <p>The NFC considers that this section of the document should include that there is an expectation that GI provision includes footpaths and cycleways to allow access and connect to the wider network.</p> <p>The NFC considers that this section of the document should to refer to Staffordshire County Council's Tree Toolkit - https://www.staffordshire.gov.uk/environment/Environment-and-countryside/Trees-and-forestry/Documents/Tree-Toolkit-web-version.pdf</p> <p>6.4. The NFC are pleased to note that we are listed as a stakeholder to liaise with in respect of GI at bullet point one of paragraph 6.4. However, please could this reference be amended to say 'the National Forest Company' rather than 'the National Forest.'</p>	<p>Noted, the SPD provides general guidance and is in a short form in order to enhance readability and provide a collected overview on the topic.</p> <p>The intention is that this SPD will raise awareness amongst developers and other stakeholders of the topics covered, and will allow them to access more detailed documents on each subject area which are referenced in each section. These referenced documents and guides, which include the county Sustainable Drainage Systems Handbook and Climate Change Adaptation Manual etc. contain more detailed case studies and illustrations.</p> <p>Noted, Agreed, SP26 is a relevant policy, and signposting to when the NFC should be consulted is agreed. New wording added to section 6 of the SPD.</p> <p>Noted, Agreed, the toolkit is referenced in footnote 2 of the SPD</p> <p>Noted, Agreed, National Forest Company now referenced in section 6 of the SPD</p> <p>Noted, Agreed, wording modified in section 6 of the SPD to specifically allow that GI provision can include cycle paths, footways and verges. Agreed, NCI guide wording added to section 6 of the SPD.</p> <p>Agreed, section 6 wording modified to include reference to connectivity.</p> <p>Noted, which of the GI options contained in section 6 an applicant can implement will depend on the site, the scale of development and other factors that can only be determined on a case by case basis. They are</p>

	<p><u>6.4.</u> The NFC considers that the document should be clear about when engagement with the NFC should occur. This could be achieved by a signpost to Strategic Policy 26 as this provides details of those developments which require National Forest planting referring the reader to the National Forest Company's Guide for Developers and Planners and the National Forest Design Charter.</p> <p>Regarding the bullet point to '<i>prioritise native tree planting in the national forest area</i>', we would request that this is reworded to '<i>prioritise Forest creation in the National Forest, in accordance with the National Forest Company's Guide for Developers and Planners</i>'.</p> <p><u>6.4.</u> The importance of connectivity should be made clearer in paragraph 6.4.</p> <p><u>6.5.</u> Although small and large scale does not appear to be defined, the NFC does not consider that the GI considerations for small scale developments is appropriate, noting that the majority of the bullet points at paragraph 6.5 could also deliver GI in larger scale schemes. Furthermore, we consider that the '<i>range of habitats.....</i>' would be more suitable to larger sites.</p> <p><u>6.5.</u> The NFC considers that the document should include that SuDS features can and should be designed to have biodiversity benefits and contribute to GI. This clearly overlaps with the GI and water management section of the document.</p> <p>7. Water Management Understandably, the focus of this section is the mitigation of flooding. However, as discussed in connection with paragraph 6.5, the NFC considers that it the overlap between SuDS features managing surface water while being designed to have biodiversity benefits and contributing to GI should be clearer.</p> <p>7.9. Although smaller developments is not defined, the NFC considers that these measures would be appropriate in larger scale developments.</p> <p>In respect of green roofs and walls, the NFC advocate the use of green roofs and walls which will contribute to GI and can contribute to the creation of a Forest identity (overlapping with the GI and design sections of this document).</p> <p>8. Renewable and Low Carbon Energy Strategic Policy 28 states that the '<i>Borough Council will prepare a Supplementary Planning Document with advice on the types of renewable energy technology and low carbon design that may be most appropriate in the different types of location in the Borough</i>'. The NFC does not consider it is clear in the document which of the examples of renewable energy at 8.5-8.12 are most appropriate where in the Borough.</p> <p>The NFC considers that the National Forest should be referenced in this section particularly noting that Strategic Policy 28: Renewable and Local Carbon Energy encourages '<i>the development of local wood fuel markets, which will, in turn, make it more viable for the woodlands of The National Forest to be brought into management, the Council will support the development of wood fuel systems which take advantage of the abundance of local woodland thinnings. Applicants will be expected to demonstrate that fuel is being sourced as locally as possible to the installation with an expectation that fuel is to be sourced from within The National Forest.</i>'</p> <p>The NFC also consider that the document should refer to wood being well seasoned and burnt in an Eco 2022 compliant stove.</p> <p>The NFC considers that Strategic Policy 26: The National Forest should also be referenced within the Renewable and Low Carbon Energy section, noting that this policy refers to the sustainability (and design and character) of new developments in the National Forest. It goes on to describe showcasing timber in building design and incorporating renewable energy, especially wood fuel heating systems and directs the reader to the National Forest Company's Design Charter.</p> <p>9. Sustainable Travel and Active Travel <u>9.1.</u> The NFC welcomes the reference to linking GI and walking and cycling opportunities.</p> <p><u>9.5.</u> The NFC considers that the importance of providing new and connecting to adjoining networks of greenways and footpath/cycleway routes for recreational purposes, as well as linking neighbourhoods and workplaces should be included.</p> <p>10: Design of new build</p>	<p>listed as options for a developer to consider, and not all will appropriate for every location.</p> <p>Noted, Agreed. Further detail on biodiversity and water management have been added to section 6 of the SPD. SuDS must be designed individually for each scheme to maximise both flood risk reduction and other benefits.</p> <p>Section 8, Different renewable energy types will be suitable for different locations and schemes, and therefore certain types by location are not dictated by the SPD. This is something that needs to be evaluated in relation to a specific proposal.</p> <p>Noted. Agreed, new wording added to section 8 of the SPD</p> <p>10. Noted, (see also SPD section 6) Agreed, new wording added to section 10</p> <p>ESBC has also recently produced updated biodiversity guidance, this was technical guidance rather than an SPD and can be read here: BiodiversityGuidanceApril2022.pdf (eaststaffsbc.gov.uk)</p>
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