

## Issue 1: Tackling the climate crisis

**Strategic Objective 1 - Ensuring new development takes a proactive approach to carbon reduction and that environments and communities in Rutland are adaptable and resilient to climate change, including managing flood risks.**

Rep id	Respondent	Agent	10. Are there other carbon saving measures or climate change related policy areas the Council should be considering in the new Local Plan?
4240	Ketton and Tinwell Joint Neighbourhood Plan Steering Group (Neighbourhood Plan Group Representative) [196]		We consider it vitally important that each case for renewable/local carbon initiatives is considered on its individual merits, and with an eye to up-to-date research and the bigger picture. For instance, there is little evidence to suggest that biomass contributes effectively to lowering carbon levels, and its production has significant negative knock-on effects elsewhere in terms of agriculture and land use.
4218	Lightsource BP (William Adkison) [999]		<p>Need to ensure that a positive strategy for the delivery of low carbon and renewable energy is brought forward to ensure this approach is achieved.</p> <p>LSbp would argue that the urgency of delivering renewable energy is more urgent than is implied in the text, particularly in the context of events in Ukraine, which has highlighted how fragile energy security is in the UK. The most appropriate way to address this is through a proactive strategy for the delivery of renewable energy and if this is a priority for the Local Planning Authority as implied in the Strategic Objectives, it should be reflected within the emerging Local Plan.</p> <p>Q8 LSbp have concerns that some key considerations are missing from Options A and B which LSbp strongly recommend are taken on board when formulating the draft version of the Plan and the detailed policies.</p> <p>It should also be noted that Options A and B are not necessarily mutually exclusive. The Council could progress both options to ensure a robust and positive approach to tackling climate change is adopted, particularly as it is at the heart of the Local Plan. For example, if the Council decide to pursue Option A, this does not mean they should not also bring forward a positively worded policy which encourages renewable energy developments outside of the areas defined under Option A.</p> <p>Option A</p>

			<p>welcome any attempt by the Council to identify areas that are suitable for renewable energy development if it means the expedition of clean energy projects within the Council to meet net-zero targets and are aware of the environmental and landscape concerns that would go into shaping such a policy. However, LSbp advise that when considering suitable areas, the Council gives regard to the following:</p> <ul style="list-style-type: none"> <li>- technological requirements for potential sites: the council should review possible grid connections and local grid capacity when assessing site feasibility. According to NPPF paragraph 155(b) “plans should consider identifying suitable areas for renewable and low carbon energy sources”. LSbp consider grid connection to be one of the driving factors in assessing site suitability, as grid connections are crucial for all renewable energy developers in that they provide route to market. If a potential site has poor grid connection, it is likely that no renewable developer will want to build on these sites, despite being earmarked for them rendering the plan ineffective. Essentially, it is vital that the Council seek input from industry experts if Option A is pursued. The identified areas cannot be based on environmental factors alone, otherwise the Council face the prospect of allocating areas which are not practical, and which will ultimately not deliver.</li> </ul> <p>If Option B is disregarded in favour of Option A, it is vital that the Council get this right and draw on expertise from the industry. LSbp are aware that local planning authorities often form stakeholder working groups when considering potential housing sites;</p> <ul style="list-style-type: none"> <li>- the potential for grid connection price inflation in areas identified for renewable development due to increased competition between renewable developers for sites within these areas;</li> </ul> <p>- As noted above Options A and B should not be mutually exclusive. If the defined areas do not deliver sufficient levels of renewable energy developments, this means the Council will not play their part in helping the nation become Net Zero. However, by having a positively worded policy that sits beside this, it would ensure that other sites could come forward to cover any shortfall. The Council should still consider applications in land not identified to ensure net zero targets are met and to positively encourage the development of low carbon technology. According to the Sixth Carbon Budget Report, to meet the UK’s carbon reduction commitments of reducing emissions by 78% by 2035 and to reach net-zero by 2050, renewables need to represent 70% and 80% of all energy generation in the UK by 2035</p>
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4138	Silver Fox Developments (John Edmond) [1138]		<p>We support the need to tackle climate change and action should be taken locally by the Council. However, we consider this action should be restricted to issues associated with the location of development.</p> <p>It should ensure that growth is located close to services and facilities, or where there are high levels of access to public transport and active travel options, which allow residents to pursue a lower carbon lifestyle. We further support other measures to address climate change such as the inclusion of SuDS, tree planting and appropriate public open space and habitat creation and biodiversity gain must be planned for, but Future Homes Standard should be set by Building Regs so that targets are consistent and there is no ambiguity.</p>
4123	Avant Homes [1131]	Mr Alasdair Thorne [562]	<p>Whilst we absolutely agree that there is a need to tackle climate change and action should be taken locally by the Council, our view this action should be restricted to issues associated with the location of development, ensuring that growth is located close to services and facilities or where there are high levels of access to public transport and active travel options which allow residents to pursue a lower carbon lifestyle. We also agree that other measures to address climate change such as the inclusion of SuDS, tree planting and appropriate public open space and habitat creation should be planned for. Similarly, it may be appropriate to specify a lower water usage standard reflection the optional standard in Part G of the Building Regulations.</p> <p>However, it is not appropriate for the Council to seek to deliver fabric improvements to properties or deliver energy efficiency standards at a local level ahead of any future tightening of building regulations. If such an approach were fostered on a large scale by local authorities it would increase barriers to housing delivery and would add significant cost to house prices as developers grapple with changing standards locally. It could also undermine the viability of many sites.</p> <p>Whilst we agree there is an urgency to move at pace to address climate change this needs to be led centrally and rolled out nationally. Should the Council seek to include higher standards there would be a need to justify such an approach through the local plan process (including at examination) and we would</p>

			expect an appropriate assessment of the costs of implementing additional requirements including through a plan wide viability assessment.
4112	MR PJSR HILL AND PIKERACE LIMITED [1130]	Andrew Granger & Co (Stephen Mair, Planning Consultant) [483]	<p>In light of the timescales for the preparation and adoption of the Local Plan, we consider that the policies of the Local Plan are likely to require further amendment subject to future national policy changes and agendas.</p> <p>With regards to the Environment Bill, the National Planning Policy Framework and the Rutland Local Plan both already include a requirement for development proposals to seek to secure biodiversity net gains. However, the Environment Bill will impose a statutory requirement to achieve a 10% net gain in biodiversity value. As such, it will be necessary for the Local Plan policies to reflect this statutory requirement.</p> <p>Government’s Future Homes Standard from 2025 will ensure new homes produce less carbon emissions. Alongside this, the government introduced major building regulations changes in June 2022, with new homes now required to produce around 30% less carbon emissions compared to the old regulations. The new standard will require all homes built from 2025 to deliver 75-80% reductions in CO2 emissions compared to homes built today. In addition, the Planning for the Future White Paper indicates that all homes built under the Future Homes Standard would be “net zero carbon ready”, with the ability to become fully zero carbon homes over time, as the electricity grid continues to decarbonise, and, therefore, reducing the need for retrofitting.</p> <p>It is anticipated that Government will introduce a similar requirement i.e. all non-residential properties to be developed as being net zero carbon ready, in due course. Therefore, we consider that it would be appropriate for the Local Plan to plan positively and prepare for the introduction of these standards now.</p> <p>We propose that the Local Plan policies should take into account for the heightened standards to be imposed by the emerging Environment Bill, and the Future Homes Standard. This would include the requirement for all development proposals to deliver a 10% net gain in biodiversity value and for all properties (residential and non-residential) to be built to be net zero carbon ready, as a minimum standard.</p>

			<p>The proposed new settlement at Woolfox has been designed to go beyond these new standards by delivering all buildings to a net zero construction standard, and evidence has been provided that such a commitment can be delivered without the need to reduce other developer contributions or policy requirements.</p> <p>WF13: Energy Strategy, prepared by Turley, sets out the proposed energy strategy for Woolfox. This strategy includes a commitment to go beyond the new national standards, such as the Future Homes Standard, by delivering all buildings to the UKGBC net zero construction standard. Whist both building-integrated and masterplan-scale approaches are identified for meeting the net zero carbon ready agenda, including through the provision of a 15MW solar farm and anaerobic digestion facility.</p> <p>WF6: Viability Statement has assessed the viability of Woolfox, on the basis of the proposals as set out in the supporting documents, including accounting for the implementation of the identified Energy Strategy and, therefore, meeting the higher energy performance standards set out above. This document demonstrates that the scheme is viable, and thus, deliverable on a policy-compliant basis and whilst meeting all other developer contribution requirements.</p>
4098	Wells McFarlane [365]	Pegasus group (Mrs Georgina Doyle) [575]	<p>Q7- The Council's plan to meeting net zero targets is not supported. It is likely that the government will increase its targets for reducing carbon emissions for a standard home within the plan period. To implement a net zero carbon strategy, the Council would need to support this requirement with robust evidence and viability to demonstrate that it would be possible to reach this target, now, without hindering the developmental growth of the County. Because the Government are already on target to significantly reduce carbon emissions, it will have done so through evidence on viability and achievability and therefore the County should follow the government approach</p> <p>Q9- The suggestion that the Local Plan should require the provision of Sustainable urban drainage Systems (SuDS) in all new built development unless it is demonstrated to be technically unfeasible is supported for major developments. Paragraph 169 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Providing the ability to demonstrate that that SuD's is not technically feasible in some developments is in line with national policy.</p>
4044	Vistry Group c/o Pegasus Group (Jonathan Porter,	Pegasus group (Mrs Clare Clarke,	<p>Q8- The proposal set net zero carbon targets for all developments on adoption of the plan or to plan towards meeting net zero at a future stated date are not supported. The Local Plan should not set a local target for net zero carbon, this goes beyond the normal role of the planning process and is better</p>

	Strategic Planning Manager) [1129]	Associate Planner) [523]	<p>achieved through changes to building regulations. It is likely that the government will increase its targets for reducing carbon emissions for a standard home within the plan period.</p> <p>If the Council decide to implement a net zero carbon strategy, this would need to be supported by robust evidence and viability testing to demonstrate that it would be possible to reach this target without impacting the Council's ability to meet the local housing need.</p> <p>Q9- The suggestion that the Local Plan should require the provision of Sustainable Urban Drainage Systems (SuDS) in all new built development unless it is demonstrated to be technically unfeasible is supported for major developments. This approach is in line with the NPPF which states at paragraph 169 that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.</p>
4037	Freeths LLP (Mr Mark Bassett, Director) [630]		<p>Q7- – Option 'C'. Neither Option A or Option B would be viable for the housebuilder market and would have a significant impact on the ability to deliver affordable housing. The explanatory text prior to the question sets out the strategy that the Government is taking in respect of the Future Homes Standard and the concept of introducing higher standards than are being considered nationally will have an adverse impact on housing delivery within the County.</p>
4012	John Dejardin [128]		<p>Promoting/increasing the counties tree cover as critical component of creating low carbon county and assisting in creating a cleaner healthier environment while increasing biodiversity.</p> <p>Promoting/encouraging retro fitting of low carbon technologies to all existing housing, commercial and industrial buildings/businesses.</p> <p>Promote and encourage agriculture to move to sustainable practices to in soil conservation and raising soil carbon content.</p> <p>Promote community renewables</p>
3989	The Society of Merchant Venturers [693]	Savills (Julia Mountford, Planning Consultant) [735]	<p>Q7- The principle of proposing a policy with specific targets to be applied from a specific date is broadly supported as this should provide clarity around expectations and requirements to deliver developments.</p> <p>Policy should however, be supported by relevant evidence. Policies should be consistent with the energy hierarchy i.e. 'Be Lean, Be Clean, Be Green'. In accordance with this approach, the overall target to reduce energy consumption should first be achieved, where possible, through the use of energy</p>

			<p>efficiency measures such as ‘fabric first’ and remaining energy requirements secured through measures such as on or off-site renewable energy and other low carbon technologies.</p> <p>The aims of the policy, i.e. to reduce energy consumption and move towards achieving net zero carbon, should be clearly set out. However, this should be achieved without prescriptively setting out how that must be done for all types and scales of development, enabling flexibility to take account of site-specific circumstances, ensuring the delivery of housing is not compromised.</p> <p>Q9- Any proposed policies should be evidence-based and reflect the requirements of Sustainable urban Drainage features in accordance with the provisions of the NPPF (July 2021) and PPG.</p>
3920	Anglian Water (Darl Sweetland, Spatial Planning Manager) [234]		<p>Anglian Water considers that in planning the spatial distribution and quantum of growth, utilising existing infrastructure capacity development will be less costly for developers and buyers of new homes and commercial property. Development which requires new infrastructure will incur additional costs from utility companies as well as increasing carbon generated by that ill planned growth. Reducing infrastructure costs also enables limited funding to be used on other objectives including more stretching environmental gains. Similarly through using existing visitor and recreation infrastructure to support tourism business and employment we can reduce the operational carbon associated with visitors and tourism. ,</p>
3887	House Builders Federation (Joanne Harding, Planning Manager – Local Plan (North)) [1125]		<p>Q7- The PPG sets out that any local requirements for a building’s sustainability and for zero carbon buildings should be based on robust credible evidence and tested for impacts on viability. The PPG also clarifies that locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and any requirement for a proportion of used energy to be from renewable and / or low carbon energy sources should be reasonable.</p> <p>Therefore, the Council should not undermine the Government’s intention to set energy efficiency standards through the Building Regulations via the 2021 Part L Interim Uplift (effective from June 2022) / 2025 Future Homes Standard. The publication of the new Approved Documents for Part L (conservation of fuel and power) and F (ventilation) reflect the interim uplift to Building Regulations on the journey to the 2025 Future Homes Standard.</p> <p>The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward. The Future Homes Standard will ensure that new</p>

			<p>homes will produce at least 75% lower CO2 emissions than one built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p> <p>The HBF considers that the Council should comply with the Government’s intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local carbon reduction because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</p> <p>Q10- The NPPF already looks for major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The HBF agrees that wherever practicable, it is important to incorporate SuDS within planned major development schemes in line with the NPPF. SuDS can improve the quality of life in a development by making them more visually attractive, sustainable and more resilient to change, by improving urban air quality, regulating building temperatures, reducing noise and delivering recreation and educational opportunities. However, it will be important for the Council to be flexible in relation to how SuDs are provided as devising an appropriate layout is going to require a very careful balancing exercise of many competing factors, particularly in relation to other planning policy requirements, the efficient use of land and the individual site circumstances. There may also be examples where an above ground solution is not feasible and other alternatives from within the hierarchy are considered. This flexibility is a fundamental aspect of the Sustainable Drainage Hierarchy</p>
3862	Ryhall Parish Council (Parish Council Representative) [435]		<p>Q8 - We should be looking to net zero carbon from the adoption of the plan. As adoption will be achieved sometime in the future, we are only looking to delay it further. All construction irrespective of it being houses, commercial, infrastructure etc should build net zero and biodiversity into their plans, and how that can be achieved, before planning is approved.</p> <p>But we do appreciate Option B is an easier alternative, but I am not sure a county size comparison should be the main focus. Everyone should work to the same goal.</p>

			Q9 - This should be considered on all developments and the plans to achieve this. Surface water management, runoff, pollution and significantly reduced flood risk are all essential criteria that need to form part of any development. There shouldn't be an 'unless' element!
3828	Sally Renner [1124]		Green spaces/tree planting  Protecting SSSI's
3816	Ketton Darby & Joan Club (Ruth Renner) [1122]		Rutland is the least wooded county in England. More trees should be planted especially the towns for lowering the temperature and cleaning the air
3780	Ketton Darby & Joan Club (Ruth Renner) [1122]		carbon saving measures are changing and developing so a flexible/innovative policy should be adopted to keep pace with ideas.
3758	Historic England (Emilie Carr) [219]		<p>Whatever approach is taken heritage assets and their settings should be fully considered. Historic England have produced a Climate Change Strategy and are currently preparing a Climate Change Advice Note.</p> <p>Historic England would wish to understand how the policies and actions of the forthcoming Local Plan will affect the historic environment, as well as recognising the positive contribution that heritage assets can make to climate change mitigation and adaptation. Plans should reference the need to retain, repair, refurbish, retrofit (where appropriate) and reuse heritage assets, and especially historic buildings.</p> <p>Some key questions to consider:-</p> <ul style="list-style-type: none"> <li>-Is it understood how the historic environment will be affected by climate change and the proposed policy/strategy/plan/action (threats &amp; opportunities)?</li> <li>-Are the positive ways in which the historic environment could contribute recognised?</li> <li>-Are there appropriate measures to ensure that harm to heritage assets is avoided, minimised and/or mitigated, including for heritage at risk? (adaptation)</li> <li>-Are there any special policies/projects/wording needed to secure the conservation and enhancement, as well as to build resilience for heritage assets? (mitigation and adaptation).</li> </ul>

			<p>Links to our guidance can form a useful basis for the evidence base. We are very happy to advise.</p> <p>Regarding Q8          Option B would be preferable, due to the level of assessment required for large scale wind farms to fully assess setting in particular.</p> <p>If Option A is progressed a criteria will be required within the corresponding wind maps policy, together with supporting text and a note on the map itself. What evidence would be provided? If renewable energy policies are to be included, heritage assets and their settings should be fully addressed. It is important to check whether the policy, or its supporting text, includes arbitrary distance measurements to be used for assessments from heritage assets to locations proposed for large-scale renewables. This should be discouraged to ensure that settings are fully assessed, on a case by case basis.</p> <p>Historic England would be very happy to advise.</p>
3722	Tim Allen [521]		<p>The need to manage surface water run-off is critical to managing the flood implications of climate change, and all developments should play their part in this. However, we consider that the Plan should also provide guidance for sites where this is not technically feasible, to provide a clear framework for where development might be considered acceptable and in what circumstances if no SUDS can be provided.</p>
3711	Greetham Parish Council (Parish Council Representative) [418]		<p>Housing should only be built in sustainable locations where shops, schools, jobs, medical facilities etc can be readily accessed by public transport. The continued expansion of Local Service Centres should not be a policy as they do not meet this criteria. The plan should include very clear strategies on how carbon zero will be achieved</p>
3692	Severn Trent (Chris Bramley) [230]		<p>Severn Trent are supportive of the approach to incorporate well designed SuDS into new development, it is vital that SuDS are designed to consider, all 4 pillars of SUDS, Water Quantity, Water Quality, Biodiversity and Amenity.</p> <p>Severn Trent are supportive of the approach to minimise the carbon impacts of development, both during construction and after, we would also recommend that water efficiency is promoted, water efficient technology also generally provides energy efficiency benefits, further detail is provided in our standard advice below</p>

			<p>Question 7 response- It may also be possible to incorporate a caveat, particularly where considered Brownfield sites that have additional constraints such as contamination to resolve, that would subsequently have an added Carbon Cost. Something similar to the wording for SUDS “Unless not Reasonably Practical”. this would enable the majority of development to meet Net Zero without it being an absolute requirement for special cases. This approach should also support the wider Government objectives</p> <p>It may also be possible to offset some of the Carbon cost through the investment in additional Biodiversity, that support other objectives within the Plan resulting in minimal additional cost to the developers.</p>
3654	Ms Janet Taylor [1109]		All new buildings to have PV panels, and the buildings to be aligned to maximise efficiency. It should be easier to upgrade buildings in conservation areas, e.g. double glazing. Proper cycle path networks to encourage local cycle trips instead of cars, with better bike parking provision. Bylaws to stop commercial premises having their doors open when the heating is on.
3540	Barrowden Parish Council (Mr Gordon Brown, Chairman) [1103]		<p>We should be looking to encourage communal ground source heat pumps and harvesting rainwater for non-potable use.</p> <p>We should also positively support sympathetic heat retention measures in listed building such as double glazing, internal wall insulation and floor insulation. (especially where buildings are listed only for Group Value).</p>
3539	Barrowden Parish Council (Mr Gordon Brown, Chairman) [1103]		Fully support SUDS and we should be looking to restrict site runoff to zero wherever possible if technically and financially feasible.
3478	Mrs Pam Allen [1085]		Yes development of large forest areas to offset Rutland's carbon emissions and also to assist other counties (less able to copy this type of development) with their emission programmes (instead of volunteering some of Rutland's land for another county's housing quota! ).
3448	Mrs Debra Thatcher [1083]		Removal of barriers to green electricity generation in conservation areas needs to be considered - how to balance the “look” of a conservation area with modern technologies
3433	Vistry Homes East Midlands [1070]	Marrons (Mr Dan Robinson-Wells,	The most effective tool planning policy has its disposal to can influence a reduction in carbon is through its spatial strategy. Identifying sustainable locations for growth, where there are existing services and facilities and active travel opportunities is inherently less carbon based than more isolated places.

		Associate Director) [535]	The Local Plan should avoid duplication of policy with other regulatory regimes. The Future Homes standard for new dwellings coming into force in 2025 is a very stringent tightening of building regulations.
3392	Mr Adam Cade [1078]		<p>New buildings - insulation, insulation, insulation, orientation, air source heat pumps,</p> <p>Self-build housing - New policy enabling self-build, low tech zero emission housing (as being developed by Cornwall CC)</p> <p>Listed buildings - solar panels on Gd 2 buildings where not visible from the highway.</p> <p>Transport - Bus depot (eg. in Ketton) in cooperation with SKDC, Cycle paths/ lanes for all new road improvements</p> <p>Commercial building - strong roofs for future panels</p> <p>landowner guidance and planning support where needed - agroforestry, wind turbines</p> <p>More ideas to be provided by the Expert Advisory Panel.</p> <p>This is all dependant on the proposed new appointment of a full time Climate Change Officer, able to support and advise on these policy areas and train Councillors and Council staff.</p>
3353	Empingham Parish Council (Mrs Rowan Scholtz, Parish Council Representative) [413]		Solar panel generation with battery power storage.
3320	Ketton Parish Council [329]	Mary Cade [638]	<p>PV panels on all new domestic, agricultural and industrial buildings.</p> <p>Encourage design of orientation of new buildings to maximise solar heating/cooling.</p> <p>No new gas or oil boilers to be fitted.</p> <p>Electric car charging points statutory on all domestic and industrial new builds.</p> <p>Create more safe cycle routes and safe cycle storage.</p>
3253	Edith Weston Parish Council (Parish Council Representative) [411]		No, as actions to tackle climate change will continually change

3208	Mrs Judy Geer [901]		Requiring new housing and industrial development to have solar panels on roofs where feasible.
3189	Taylor Wimpey Straetgic Land [660]	Bidwells (Mr Mark Harris, Partner) [659]	<p>TW believe that reducing energy use and carbon emissions in new buildings is best addressed through Building Regulations rather than ad hoc policies set on an authority-by-authority basis. Such an approach allows proper investment in carbon reduction within the design of housing and consistency of application.</p> <p>Q9 - we agree that SUDS should be required in new development schemes where this is feasible. It is however essential that an allowance for feasibility is maintained in any future policy as it is not always possible to deliver the level of surface water attenuation features that some Lead Local Flood Authorities insist on.</p> <p>Each site is different and an over instance on surface attenuation can often stifle development and compromise other aspects of development, including for example area for play and landscaping.</p>
3161	Mr Martyn Williams [1055]		<p>All new developments should have the following carbon saving measures:</p> <ul style="list-style-type: none"> <li>-washing line for drying clothes outside</li> <li>-bike storage (dry and secure)</li> <li>-plug-in chargers for electric cars, either in individual house, or per three households</li> <li>-solar panels as standard</li> <li>-installation above and beyond the gov-mandated level</li> <li>-Hedgehog holes in all solid fencing</li> <li>-Hedgerows as the default for new development boundaries</li> <li>- Allotments need to be provided for all, we should have a surplus and nobody should ever have to wait for one.</li> </ul> <p>In addition the following guidelines from CPRE should be adhered to:</p> <ul style="list-style-type: none"> <li>- All new developments demonstrate a measurable reduction in net carbon emissions over the life of the development;</li> <li>- All transport interventions demonstrate how they will deliver a reduction in private car mileage;</li> <li>- Any above-baseline targets to boost the amount of housing and employment development must also be justified on the basis of the additional carbon reductions they will deliver;</li> <li>- All local plans should contain a robust strategy for delivering the council's net-zero carbon target integrated across the plan as a whole, and this should be an additional test of soundness at examination.</li> </ul>

			Decision-makers need policies that empower them to refuse planning applications that do not contribute to these requirements.
3160	Mrs Hannah Williams [925]		<p>All new developments should have the following carbon saving measures:</p> <ul style="list-style-type: none"> <li>-washing line for drying clothes outside</li> <li>-bike storage (dry and secure)</li> <li>-plug-in chargers for electric cars, either in individual house, or per three households</li> <li>-solar panels as standard</li> <li>-installation above and beyond the gov-mandated level</li> <li>-Hedgehog holes in all solid fencing</li> <li>-Hedgerows as the default for new development boundaries</li> <li>- Allotments need to be provided for all, we should have a surplus and nobody should ever have to wait for one.</li> </ul> <p>In addition the following guidelines from CPRE should be adhered to:</p> <ul style="list-style-type: none"> <li>- All new developments demonstrate a measurable reduction in net carbon emissions over the life of the development;</li> <li>- All transport interventions demonstrate how they will deliver a reduction in private car mileage;</li> <li>- Any above-baseline targets to boost the amount of housing and employment development must also be justified on the basis of the additional carbon reductions they will deliver;</li> <li>- All local plans should contain a robust strategy for delivering the council's net-zero carbon target integrated across the plan as a whole, and this should be an additional test of soundness at examination.</li> </ul> <p>Decision-makers need policies that empower them to refuse planning applications that do not contribute to these requirements.</p>
3126	Mr Roger Banks [1056]		All vehicles operated by, or for the Council should be changed out to electric vehicles as soon as practically possible. This includes bus services and eventually refuse collection vehicles.
3065	Leicestershire County Council (Mitch Harper, Public Health Strategic Lead - Rutland) [939]		Climate change will affect all of us, but particularly those most vulnerable to the adverse impacts (older adults, children, disabilities). A policy (and/or evidence base) on other extreme climate alongside flood risk would be beneficial. For example, extreme heat and cold (both with significant health risk). There are a range of measures possible for reducing heat on developments, including street trees offering shaded areas and lower temperatures. Some of this may be covered in other issues.
3023	Mr Malcolm Touchin [1038]		A policy around development of renewable energy supply and storage facilities is needed to ensure that any new facilities are coherent with other developments, especially as regards the use of land, and so

			that adequate diversity of supply can be maintained. There are a number of options for renewable energy which should be considered. The policy should cover, for instance, fitting solar panels on all industrial roofs, and the extent to and areas in which wind turbines will be allowed.
2943	Mr Brian Grady [1052]		Support for insulation of domestic premises
2828	Defence Infrastructure Organisation (DIO) [1042]	Montagu Evans LLP (Miss Lauren Hawksworth, Associate) [1041]	No comment
2820	CPRE Rutland (Mr Ron Simpson, Chair) [1036]		Rutland should offer to host one of the yet to be allocated mini nuclear reactors ensuring the county's countryside is protected from inappropriate wind and solar proposals. Locally agreed 'on roof' solar constructions are acceptable where locally desired and agreed. Given the country's success with off shore wind, there is no need for onshore wind except where desired in isolated rural locations. Critical to the wind and solar debate is the ability for new structures to be able to function off grid ensuring sustainability of local supply and be of cost benefit to the host. Such a new local policy requiring this on all new installations would be a genuine contribution to the county's sustainability in times of national crisis.
2786	North Luffenham Neighbourhood Planning Group (Tim smith) [265]		Solar panels generation with battery storage and wind farms on suitable sites.  Biomass: 'green' gas generation.
2719	Braunston Parish Council (Mrs Carole Brown, Parish Clerk) [1003]		PV roofs should be specified for all developments (new residential, new and existing commercial where practicable  Increased air tightness and insulation should be required for all new developments  Automatic approval of improved window designs (low energy loss) in listed/protected/conservation area buildings
2675	Mr Jamie Weir [1030]		Plant more trees
2621	Define (on behalf of William Davis Homes) (Mr Sam Perkins,		Energy Efficiency standards (Additional comments regarding Question 7):  The LPR should seek to align the Plan's energy efficiency standards with the standards set out by the

	Graduate Planner) [1027]	<p>Government through Building Regulations or the Future Homes Standards (FHS) once adopted; rather than seeking to impose higher energy efficiency standards (whether from the Plan’s adoption or a stated future date).</p> <p>Such an approach would be contrary to the Government’s clear intention to set nationwide energy standards. Notably, the Government’s response to the FHS consultation states that “we must ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice.” A key element is ensuring that economies of scale are in place to provide the technology required to support the ambitious energy reductions at a viable price. Thus, setting requirements that are above and beyond Government standards on efficiency (that themselves have been viability tested to ensure they are deliverable) could undermine its desire to standardise energy efficiency targets in a deliverable manner. Requiring efficiency standards as high as net zero carbon may risk the viability and deliverability of some schemes. Moreover, even if they do not render schemes unviable, consideration must be given to the cost that is passed on to the end-user, which will be more significant if those economies of scale are not in place.</p> <p>Importantly, RCC should consider the merits of a ‘fabric first’ energy approach. WDH has adopted such approaches in their housetype design, which reduces each dwelling’s inherent energy demand. The approach includes installing water saving appliances, highly efficient gas condensing boilers and gas savers and waste water heat recovery systems. The approach means that a number of benefits are built into the property for its whole life, reduces CO2 emissions, does not require maintenance (unlike renewable technologies), avoids concern over whether the technologies are actually being used, and reduces energy bills for consumers (which is critical during the current cost of living crisis).</p> <p>Notwithstanding that, any policy must be subject to a comprehensive viability assessment that considers the cumulative impact of all proposed policy requirements in the Plan in order to ensure that its policies and proposed allocations are all deliverable in accordance with NPPF paragraph 35c.</p> <p>Renewable Energy Opportunity Areas (Additional comments regarding Question 8):</p> <p>Should RCC proceed with identifying areas that may be suitable for the delivery of commercial scale renewable / low carbon energy proposals, any policy should be clear that the identification of an area’s</p>
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			renewable energy potential should not automatically render other development proposals unsuitable. Rather, all proposals for other uses should be considered on their own merit.
2603	Ms SUSAN SEED [1028]		<p>Absolutely there are other ways to help the Environment. All new builds and old houses that have roofs could be fitted with Solar panels. I am against any solar fields or wind turbines. We need all agricultural land for food not heating or charging phones.</p> <p>Energy companies could help with insulation on older properties which in the end helps everyone. No green field spaces should be used for building there must be enough brown fill sites.</p> <p>New houses should be built properly and not thrown up so they meet all targets for net zero in the future.</p>
2573	Ms Lelia O'Connell [1008]		Ensuring all new housing are carbon neutral, ensuring all public transport in the county are carbon neutral. Ensuring all new businesses are carbon neutral.
2534	Pigeon Investment Management Ltd [1022]	Carter Jonas (Ms Kimberley Brown, Associate Partner) [601]	<p>Question 9 Paragraph 169 of the NPPF expects major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. National policy and guidance already sets out the approach towards sustainable drainage systems, which it is not necessary to repeat in the emerging RLP.</p> <p>Question 10 It is noted that Issue 7 and Question 39 deal with sustainable modes of transport. However, it is considered that the location of development and sustainable transport should also be referred to as part of the carbon saving measures and climate change related policy area. Paragraph 105 of the NPPF expects the planning system to actively manage patterns of growth to support transport objectives, and states in part that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health". There is a clear link between the location of growth, access to sustainable modes of transport, and air quality. It is requested that the location of development and sustainable transport are included as part the development strategy for the emerging RLP and aspirations to tackle the climate crisis.</p>
2524	Mr Harold Dermott [1001]		RCC must accept that to improve their proven inadequate response to climate change between (at least) 2005 to 2018 (Fig 6.2 SA document), they need to make changes. One of these changes is to require developers to fit more appropriate (larger) solar panels to every new home built. Solar panels are not

			<p>some freak new technology, but are made globally in high volume and low cost. They are very easy to install on new homes and can easily provide up to 100% of a household electricity requirement. With gas heating being phased out from 2025 (at the very start of this new Local Plan), and supported by the NPPF and government Net Zero planning, it would be unreasonable for RCC not to require this. The developers will whine as they always do, but house specifications have changed beyond recognition in the last ten years, and still they are bought and sold. There is no suggestion that humans having to change their habits so they continue to have a planet to live on will be effort or cost free. However these costs will apply to all homes in all counties, so will not disadvantage Rutland.</p>
2465	Francis Jackson Homes Ltd (Mr Paul Johnson, Land and Planning Director) [761]		<p>Have the Council considered a positively worded policy about supporting on-site renewable energy generation and low carbon heating technologies in new housing development? Also, for the larger SUE's and any potential new Garden Villages or similar, District Heating should also be encouraged where viable and feasible.</p>
2442	Uppingham Town Council (Parish Council Representative) [445]		<p>Better and cleaner transport would help cut private car journeys. Better provisions for cycle and footpaths usage. Urgent attention also needs to be given to cutting HGV traffic passing through Uppingham town especially North/South on the A6003.</p>
2420	Muller Property Group [1012]	Harris Lamb (Miss Josie Hobbs, Planner) [1010]	<p>Measures for householders to install and implement small scale renewable energy infrastructure such as solar panels, air source heat pumps if they should choose to do so would be welcomed.</p>
2258	Uppingham Neighbourhood Plan Group (David Ainslie) [270]		<p>Better and cleaner public transport would help to cut private car journeys. Urgent attention needs to also be given to cutting HGV traffic passing through the town, especially North/South on the A6003.</p>
2252	Mr Murdo Ross [890]		<p>Large housing developments take place of a period of 10 years. The introduction of new Building Regs establish standards that are already known and costed. They should be applied to all developments in progress at 5th April 2025.</p> <p>We live in an region of low rainfall. A new reservoir is required in S Lincs to meeting presently forecast demand. Anglian Water acknowledge that this will require further abstraction from already depleted rivers. Why are more rigorous water conservation standards not required now to preserve our environment?</p>

2228	Severn Trent (Chris Bramley) [230]		Severn Trent are supportive of the approach to minimise the carbon impacts of development, both during construction and after, we would also recommend that water efficiency is promoted, water efficient technology also generally provides energy efficiency benefits, further detail is provided in our standard advice below.
2083	Mr George Bretten [995]		No
2061	Mrs Penelope Forbes [994]		Solar panels and wind farms in appropriate areas Biomass gas generation
2044	Edith Weston Neighbourhood Plan Group (Julie W) [783]		Protecting verges & hedges and insisting that all new development plans for both of these too. All new development to have electric charging points and roof tile matching solar panels.
2008	Edith Weston Neighbourhood Plan Group (Julie W) [783]		Preserve all existing and insist on more wide verges and natural hedges throughout the country - see CPRE report  Established Trees removed for planning should be replaced by 5 new ones - if not on site then close by  Buffers between developments should be large swathes of planted land  Charging points for each new house compulsory
1963	Mr Malcolm Forbes [988]		Solar panels mandatory for new housing as the default position. Omission of panels by justification during planning.
1939	Mr Bernard Glick [987]		Solar panels generation with battery storage and wind farms on suitable sites.  Biomass: 'green' gas genera
1897	Mr David Lewis [983]		The Council should require carbon saving standards above and beyond national standards. For example, all new homes and commercial buildings should be required to have solar panels installed on the roof, plus very high standards of insulation, and new developments must include safe cycling routes. Establishing these standards up front will enable developers to consider carbon saving measures when calculating the value of land, ensuring they do not overpay for land. This will help to reduce the risk of development becoming "unaffordable."
1863	Ms Rosemary Harris [984]		The new Local Plan should leave the Council open to consider new carbon saving measures and climate change related policy areas as they become available in the future.

1857	Mr Paul Hargreaves [966]		There is no climate crisis. When you go on about carbon etc, what you really mean is carbon dioxide gas which is very different from carbon. Carbon dioxide does not control the earth's climate, the Sun does along with many other factors. Carbon dioxide is a vital life giving gas. The most prevalent green house gas by far is water vapour. Without green house gases the Earth would freeze.
1811	Mr Laurence Howard [979]		Building new housing close to centres of employment
1777	Mrs Kim Cross [978]		Do we have a policy for people wanting to put solar panels on existing roof tops in conservation areas if not then we should have one, alongside a requirement for all new builds to have roof top solar panels.
1754	Ms Gayle Burgess [976]		Increase the provision of electric charging points for cars in towns such as Oakham and Uppingham (beyond the few available in the Tesco car park)
1698	Barry Hobbs [646]		Yes encourage cycling and walking
1677	Mr David Billsdon [970]		Assess carbon production in location of developments i.e. ensure carbon miles are minimised.
1530	Whissendine Parish Council (Parish Council Representative) [447]		Rural transport
1502	Mr Andrew Lunn [689]		RCC powers on climate control are limited and needs to follow government's legislation and aligned with other counties.
1477	Janet Underwood [125]		There should be consideration of using the roofs of large commercial buildings ( factories, supermarkets etc) for solar panels to generate electricity. Also, businesses should be included in the net zero target - not just housing
1335	Mr John Redshaw [919]		A commitment to continually review the evolving energy creation technology and apply as appropriate and in a timely fashion. - eg solar panel design and materials may allow the council office building to be coated!  Internet connectivity - continue to improve and promote working from home
1288	Mr Tony Wray [545]		Question 7, there is an assumption that carbon-zero would be more expensive. This is unfounded. There are many carbon-zero options for building design and materials that are being used extensively both in the UK and abroad. Planners must be encouraged to embrace and support innovative local designers and builders to build low cost, affordable, rural dwellings. The major house developers have a vested interest in only progressing at the pace of the slowest to adopt to new standards.

1277	Oakham Quaker Meeting (Ms Susan Bolter, Clerk) [941]		Requiring more tree planting in urban areas. Trees provide shade and will assist in lowering temperatures in towns and villages.
1258	CLA (John Greenshields, Chartered Surveyor) [937]		The Council should be hesitant when seeking to privilege certain measures over others. As the application of measures should be assessed on a case by case basis and empirical evidence. It is worth noting that over the lifetime of the proposed Local Plan technology, national policy and funding in this area will change so there should be a certain degree to flexibility.
1221	Mr Rob Ormrod [930]		<p>Approaches to climate change need to be multi-pronged, and so whilst it is of course vital that all new development is zero carbon, landscape management strategies that incentivise (or even better, mandate) improved carbon sequestration should be considered (soil improvement, rewilding, habitat protection and expansion etc etc).</p> <p>Also, I think the issues around viability and net zero carbon developments are a distraction. Developers will always argue that doing things that harm their profits make them unviable (and yet Persimmon managed to make a profit of £1billion last year..) Unless they're forced, that won't change. Kicking the can down the road won't force change.</p> <p>Rutland CC should follow what has been done by Reading Borough Council, where their 2019 Local Plan requires that all new residential developments of ten or more homes are built to zero carbon standards if possible. The Plan states that if reaching the zero-carbon standard is not possible (as determined by the developer), the development must deliver a 35% or greater reduction in carbon emissions compared to minimum UK standards, and the developer must pay £1,800 per tonne of carbon emissions to offsetting in Reading (with offsetting relating directly to energy efficiency or renewable energy contributions in the local area).</p>
1123	Nick Townsend [153]		These are better set at national level
1047	Mr Peter Tippet [906]		Ensure the maintenance of supply of fresh water and the safe and environmentally friendly disposal of waste water with the onset of the increase for demand (more houses more strain on the current infrastructure!)
976	Mrs Victoria Owen [902]		<p>Allowing solar panels on listed buildings if they can be hidden from view. Taking a more lenient approach to double glazing in listed buildings - of which there are many in Rutland -</p> <p>Encourage developers to conserve water as opposed to let it all just run off and encourage those villages</p>

			without main drains - Teigh being one of them - to use eco - friendly products to improve septic tanks so that sewage does not get into the streams.
732	Environment Agency (Mrs Nicola Reyman, Planning Specialist) [855]		<p>Question 7 additional comments: We strongly support the inclusion of a policy to reduce energy use and carbon emissions in new buildings. This would help Rutland contribute to the UK target of becoming net zero by 2050.</p> <p>Consideration should be given to embodied carbon in building new homes and whether they would need to be retrofitted to meet higher standards in coming years, for example understanding the cost of carbon of new homes introducing fossil fuel-based heating which would need upgrading to low carbon heating. This will help understand how a more proactive policy approach could reduce the net emissions for the lifetime of the development.</p> <p>We do not support option C to not set a local target.</p> <p>Question 8 additional comments: We support the inclusion on a low carbon and renewable energy policy to set out the expectation of what proposals should achieve to remove any ambiguity and ensure consistency in the decision-making process. It is vital that the option taken forward ensures the protection of important sites for nature conservation and biodiversity.</p> <p>Question 10: We welcome the inclusion of a policy regarding SuDS as set out in our response to question 9. However, we strongly advise that the Local Plan includes appropriate policies to address surface water management, water supply and foul drainage.</p> <p>We note that there is no reference to water resources and protecting the water environment. Water resource availability and water quality are and will continue to be impacted by climate change, and therefore it is important that the Local Plan responds to these challenges. The Water Framework Directive (WFD) aims to protect and enhance the quality of surface, freshwater, groundwater, estuaries, and coastal water.</p> <p>The Local Plan should include a policy that can contribute to the achievement of good chemical and ecological status for all water bodies in Rutland, and that WFD requirements are met.</p>

			<p>Furthermore, Rutland has been identified as an area of serious water stress. There is an opportunity for the Local Plan to protect and enhance water resources to ensure the availability of clean water in Rutland which can support the growth ambitions of new housing and employment development, whilst providing opportunities for wildlife and natural assets. For example, we would expect a policy on water resources to set the requirement to exceed the current Building Regulation water efficiency standards.</p> <p>Please use the England   Catchment Data Explorer to see what improvements are needed to get local waterbodies to good status. Thereafter, we recommend working with the Environment Agency, water companies and other relevant stakeholders to ensure the plan can help make a positive contribution to this.</p> <p>In addition, it is vital that the new Local Plan includes a flood risk policy to ensure that all development proposals will be considered against The Framework, including the application of the sequential test, and where required, the exception test. It should address all types of flood risk and set the requirements for planning applications to ensure development is climate resilient through appropriate adaptation measures. Furthermore, flood risk policy could suggest that development should include mitigation measure to help reduce flood risk to the wider area and existing properties at risk through measures, including additional flood storage.</p> <p>We welcome the reference to updating the Strategic Flood Risk Assessment (SFRA) in paragraph 3.2.13. Please note, the SFRA guidance has recently been updated, as has the guidance for assessing the impacts of climate change. We would therefore expect the new SFRA to consider the updated guidance. Please see additional SFRA good practice guidance here: <a href="#">Strategic flood risk assessment good practice guide   ADEPT (adeptnet.org.uk)</a>.</p> <p>We recommend viewing the National Flood and Coastal Erosion Risk Management Strategy for England (2020). The strategy sets out our three clear ambitions concerning future flood risk and investment needs; climate resilient places; today's growth and infrastructure resilient in tomorrow's climate; and a nation ready to respond and adapt to flooding and coastal change. We propose a range of adaptation and resilience measures throughout the document, with an emphasis on nature-based solutions, the incorporation of which should be taken into consideration when preparing the Plan.</p> <p>Therefore, we would welcome the Local Plan to consider additional policies to support nature-based</p>
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			solutions to provide multiple benefits, including carbon capture and sequestration, flood management, support wildlife and habitats, and health and wellbeing. We recognise that the Plan proposes an option to include green and blue infrastructure. We recommend that the climate change section refers to subsequent policies on sustainable transport and green and blue infrastructure which are important elements of climate change mitigation and adaptation.
697	Mrs Hilary Smith [868]		solar panels & wind farms , heat source pumps in new developments
683	Mrs Karen Nagel [866]		The council should embrace developers and individuals looking to build 'eco' homes as long as they do not detract from the environment. Incorporating water collection and recycling of 'used water' into homes e.g. for flushing toilets, installing insinkers drastically reduces food waste and therefore the volume of rubbish for bin collecting unless Rutland could implement food waste collections to reduce amounts going to landfill or waste treatment.
647	Mr Andrew Nebel [864]		Yes all property should be future proofed to be zero emissions
646	Mr Andrew Nebel [864]		Properties should be future proofed to accommodate heat pumps, integral roof solar panels , surface water cisterns , grey water cisterns etc  Without which zero emissions in 2050 will not be achieved.
604	North Luffenham Neighbourhood Planning Group (Tim smith) [265]		Solar panels generation with battery storage and wind farms on suitable sites.  Biomass: 'green' gas generation.
490	Mr Nigel Roberts [705]		Plant more trees
456	Richard Camp [155]		Please see my comments under Question 3
439	Mrs Stephanie Cornwall [829]		Green areas and arable/farming land need to be maintained, because food sources for the future will depend on these, as well as the environment as a whole. However, wind farms situated away from residential areas, and solar panels on new buildings, which offer the facility to sell back disused energy to the grid, should help to make the area less dependent on fossil fuel suppliers.
284	Mr Graham Layne [801]		Encourage the use of public transport, cycling and walking for shorter journeys.  Promote the reuse energy generated by industrial processes throughout the county
250	Mr Christopher Jordan [712]		All new developments should be assessed against the following questions

			<p>What type of heating is going to be installed?</p> <p>What standard of insulation will be installed?</p> <p>Is the layout suitable for solar panels to be installed on as many properties as possible?</p>
197	Natural England (Roslyn Deeming, Senior Planning Adviser) [236]		<p>Question 7 additional comments: Natural England does not have a preference with options A or B provided it is clear how net zero will be achieved particularly with respect to the provision of biodiversity habitats and green/blue infrastructure which contribute to carbon capture.</p> <p>Question 8 additional comments: Option A Natural England suggests that areas should be identified that may be suitable for renewable/low carbon proposals as this would provide clearer guidance for the protection of important sites for nature conservation or landscape.</p> <p>Question 9 additional comments: Yes, Natural England agrees with the requirement for SUDs where technically feasible and these schemes should include biodiversity enhancements to contribute to the wider Nature Recovery Network.</p> <p>Question 10: Natural England suggests that the Climate Change policies should include policy guidance on “Nature-Based Solutions” which can play an important role in aiding climate change adaptation. Nature based solutions are measures such as green roofs and walls, street trees, SuDS, and wetlands. This approach also includes the creation of a better linked habitat network by conserving, creating, or enlarging existing habitats which will build up resilience to climate change at a landscape scale.</p>