



RUNNYMEDE BOROUGH COUNCIL

**RUNNYMEDE BOROUGH COUNCIL ENERGY & CLIMATE CHANGE
MITIGATION SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 (AS AMENDED)**

REGULATION 12 STATEMENT OF CONSULTATION

August 2024

1. Introduction

- 1.1 The Town & County Planning (Local Planning) (England) Regulations 2012 ('the Regulations') set out in Regulation 12 that before a local planning authority adopts a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
- i) The persons the local planning authority consulted when preparing the SPD;
 - ii) A summary of the main issues raised by those persons; and
 - iii) How those issues have been addressed in preparing the draft SPD.
- 1.2 This document is the Statement of Consultation for the Runnymede Borough Council Energy & Climate Change Mitigation Supplementary Planning Document (SPD) and sets out the persons the Council consulted in preparing the SPD, and how their comments have been addressed.
- 1.3 The Council sought view on early drafts of the SPD from individuals and groups identified in Section 2 below. Section 3 identifies the main issues raised, and how the draft SPD addressed those issues.
- 1.4 The Council held a formal consultation between Wednesday 5 June 2024 and Wednesday 31 July 2024. The Planning Policy Team contacted all stakeholders (neighbouring local authorities, other organisations, members of the public, businesses and amenity groups) whose email addresses are held on the Planning Policy Consultation database about the consultation. Appendix A of the Council's [Statement of Community Involvement](#) (SCI, 2021) details the bodies registered with the Council.
- 1.5 Additionally, the Planning Policy Team sought the views of councillors (including those of the Planning Committee), and those whose email addresses are held on the Council's Climate Change database. A feedback session was held with the Planning Committee on Wednesday 26 June 2024.
- 1.6 The Planning Policy Team also publicised the consultation on the Council's website, and distributed hard copy consultation documents in the Borough's libraries and main office at the Civic Centre in Addlestone, in accordance with the Council's Statement of Community Involvement (SCI). The consultation was also promoted to the local community via the Council's social media channels.
- 1.7 Section 4 sets out how ten representations were received during the formal consultation. A summary of the issues raised are provided in Appendix 1, along with a column showing how those issues have been addressed in the revised SPD, or why no changes are considered necessary.

2. SPD preparation and early stakeholder and community involvement

- 2.1 As part of preparing the draft SPD, early stakeholder and public engagement took place, including:

- Scoping engagement

Proposals to create energy guidance to supplement the implementation of energy-related policies of the 2030 Local Plan (notably parts of Policy SD7: Sustainable Design and the entirety of Policy SD8: Renewable & Low Carbon Energy) were

discussed at a various community events, senior officer and councillor meetings as part of early engagement activity in developing the Council's Climate Change Action Plan (which supports delivery of the Council's Climate Change Strategy). Planning constraints were identified as a potential barrier to climate change action in addressing the climate emergency, and discussion points included scope for the Council to commit to producing a suite of documents to improve the delivery of energy efficient, net zero/low carbon buildings via actions under the 'greener homes and buildings' theme in the Action Plan. The potential content and structure of an SPD was discussed.

The outcomes of the Council's Climate Change Study were presented at a Climate Change Members Working Party in November 2023. The Study recommended producing supplementary planning guidance as an interim measure ahead of strengthening climate change planning policies as part of the Local Plan Review, and options for an SPD were discussed with councillors.

The events and meetings were held on the following dates:

- Focus group session with local residents and voluntary groups, including members of the Community Planning Panel, on Monday 24 July 2023;
- Climate Change Officers Working Group Meeting – 31 July 2023;
- Community Town Team and Action Group Meetings with local residents, voluntary groups and local councillors in Egham, Chertsey, Addlestone, and Englefield Green on 11, 13, 19 and 20 September 2023 respectively;
- Planning Committee – 25 October 2023 (Local Plan Update Report, including options to produce energy guidance);
- Climate Change Members Working Party – 22 November 2023 (Climate Change Study outputs, including recommendations to produce energy guidance).

The feedback received was assessed and where possible, adjustments were made to the proposed scope of the SPD, including reference being made to an adapted version of the Cotswolds, West Oxfordshire and Forest of Dean Councils Net Zero Carbon Toolkit (produced under Creative Commons License and openly available for other local authorities to amend and adopt) to promote best practice over and above minimum 2030 Local Plan standards.

- Pre-consultation engagement

An early draft of the energy guidance was shared with senior Development Management (DM) officers for review in advance of public consultation, with particular focus on information requirements for different types of development; for different types of planning application; and the methodology for calculating the percentage of energy demand generated through the provision of renewable and/or low carbon technologies at step 3 of the energy hierarchy. These sections were updated to reflect feedback received and ensure the SPD would be fit-for-purpose for use by DM officers.

An early draft was also shared with the Council's heritage consultant to review relevant sections relating to the sensitive management of heritage assets. Feedback indicated that no changes were necessary - these sections would provide useful clarity about the process i.e. understanding the asset; considering any opportunities for energy efficiency; and assessing any impacts.

2.2 Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening has also taken place on the draft SPD in consultation with three

statutory consultees (Environment Agency, Natural England and Historic England), concluding that a full SEA and Appropriate Assessment is not required for the SPD. The responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the draft Energy SPD, available alongside the SPD consultation materials.

3. Summary of the main issues raised by stakeholders during the preparation of the draft SPD and how they have been addressed

3.1 Some of the main issues raised during the preparation of the SPD have included:

- A desire to implement net zero carbon standards which go above and beyond the minimum requirements of the 2030 Local Plan: In response to this, reference to the Council's recently adopted Net Zero Carbon Toolkit has been included in the draft SPD to encourage developers to go above and beyond the minimum requirements of the Local Plan. However, as there are limitations on the introduction of new policies in an SPD¹, a clear distinction has been made between the existing planning policy requirements, and best practice guidance in working towards net zero carbon standards.
- A desire for additional themes to be included in the SPD to address climate change adaptation: An SPD addressing a wider number of climate change themes was considered, for example to include green infrastructure, ecology, waste and materials and sustainable drainage, but officers felt that this would duplicate existing guidance such as the Green & Blue Infrastructure SPD², and Surrey County Council guidance³. Development Management officers in particular felt that concise guidance would be more beneficial and useful for both developers and decision-makers.
- Difficulty in dealing with development resulting from change of use under permitted development rights: The Council has limited power to influence any change of use development which does not require planning permission. However, a section has been included in the draft SPD to explain how change of use development which requires planning permission should apply the renewable and low carbon energy requirements of the Local Plan.
- The belief that the SPD should also address unregulated energy: During the preparation of the 2030 Local Plan, all policy requirements were assessed for viability – including its energy requirements – to ensure that the cumulative cost of all relevant policy requirements would not undermine deliverability of the Plan. The assessment assumed that only regulated energy needs would be modelled in implementing the requirements of Policy SD8, and the SPD cannot therefore introduce new policy requirements extending to unregulated energy. However, the best practice guidance included in the draft SPD encourages developers to consider 'operational energy', including unregulated energy, wherever possible.
- A desire for all scales of new development to apply the energy hierarchy: The draft SPD includes a section on 'Information Requirements' which clearly sets out what information should be submitted in support of planning applications for both major and non-major development. A questionnaire has been included at Appendix 1 to ensure non-major proposals consider the relevant energy and sustainability issues in a proportionate manner.

¹ Made clear by the National Planning Practice Guidance at: [Plan-making - GOV.UK \(www.gov.uk\)](http://www.gov.uk) (Paragraph: 008 Reference ID: 61-008-20190315), and Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

² Available at: [Supplementary Planning documents and other guidance – Runnymede Borough Council](#)

³ Available at: [Sustainable Drainage System Design Guidance - Surrey County Council \(surreycc.gov.uk\)](http://surreycc.gov.uk)

- To produce guidance on balancing the need to mitigate climate change, and the need to mitigate potential impacts on heritage assets when being retrofitted with energy efficiency measures: A section has been included to provide clarity on this in the draft SPD.

3.2 As described above, amendments were made to the scope and content of the SPD to address, where possible, the issues raised in early engagement activities.

4. Formal Consultation on the draft SPD

4.1 The Planning Policy Team has considered all the responses received during formal public consultation. Ten representations were received in total. Appendix 1 contains a table setting out the main issues raised in these representations. It also sets out the Team's response to each of the issues, the changes made to the SPD as a result of the issue, or explains why no changes were considered necessary.

4.5 The main issues raised by either prescribed bodies⁴ or key stakeholders are identified at the start of the table. Key stakeholders include statutory consultees, infrastructure providers, site promoters/developers, and other community groups/organisations. The main issues raised by members of the public and local councillors are in the second part of the table.

5. Next Steps

5.1 The Council has considered all the responses received during early engagement and formal consultation.

5.2 A final version of the SPD will be presented to the Planning Committee in September 2024 for adoption and implementation. Once implemented, the SPD will become a material consideration in decision-making on planning applications. The Planning Committee Minutes can be accessed at:
<https://democracy.runnymede.gov.uk/mgCommitteeDetails.aspx?ID=153>

⁴ As listed in Regulation 4 of the Town and Country Planning (Local Development) (England) Regulations 2012.

Appendix 1: Summary of main issues raised and how they have been addressed

Comment	Response	Changes made to SPD
Prescribed Bodies and Key Stakeholders		
National Highways		
Reviewed document but no comments to make.	Noted.	No changes.
Natural England		
Reviewed document but no comments to make.	Noted.	No changes.
Waverley Borough Council		
Having declared a climate emergency, is supportive of the measures taken to tackle climate change and achieve net zero objectives in consultation with local communities.	Comments noted.	No changes.
Spelthorne Borough Council		
Reviewed document but no comments to make.	Noted.	No changes.
Rushmoor Borough Council		
Reviewed document but no comments to make.	Noted.	No changes.
Windlesham Parish Council		
Reviewed the document and noted the consultation.	Noted.	No changes.
Surrey County Council		
Climate change team considers the SPD to demonstrate best practice which supports robust planning, monitoring and verification of low carbon and energy efficient buildings. Considers the SPD, alongside the adopted Net Zero Carbon Toolkit, to provide comprehensive information to aid the local planning process in supporting energy efficient and net zero development. This includes reference and target setting from industry developed building and construction standards including: BREEAM, Home Quality Mark, Passivhaus and Enerphit. Cross-referencing with the Net Zero Carbon Toolkit will help uplift standards/policies set out in both the local plan and prescribed nationally under the current building regulations regime. The SPD has also laid out stringent information requirements, providing pre and post-completion verification of standards – this will provide the basis to support the planning, design and evaluation stages of development works.	Noted.	No change required.

<p>The SPD should account for projected changes in national policy and building regulations where feasible.</p>	<p>Various sections of the SPD explain how requirements may change with the introduction of any Future Homes & Buildings Standards via the Building Regulations regime. In particular, the SPD provides plenty of guidance on air source heat pumps as a potential technology to 'be green', in recognition of new Part L requirements supporting the use of this technology. However, since drafting the SPD, the Government has published a revised National Planning Policy Framework (NPPF) which is currently subject to consultation. The proposed revisions do not fundamentally change the chapter on climate change, but the SPD will be amended to allow for the introduction of a revised NPPF later this year.</p>	<p>Yes. In paragraphs 2.5 and 2.6 of the SPD, references to 2023 NPPF paragraph numbers have been removed to allow for introduction of a revised NPPF, with new paragraph numbers. Footnote 15 on p13 has also been updated to address the possibility that major development proposals for renewable energy may come forward on 'grey belt' land and may therefore not constitute 'inappropriate development' in the Green Belt. New text states: "Should a revised NPPF be adopted which allows for renewable energy development on 'Grey Belt' land through decision-making, the Council will assess whether any associated rules/policy requirements have been satisfied and that the function of the Green Belt is not fundamentally undermined. Information required will be confirmed in the Council's validation document." This is to provide clarity that there will continue to be specific information requirements for this type of development.</p>
<p>Ottershaw Neighbourhood Forum</p>		
<p>The Executive Summary on p4 states that "Major new development is required (and non-major development is encouraged where feasible) to supply a minimum of 10% of total energy needs from renewable / low carbon technologies (see Section 7)". Suggests the inclusion of a statement about encouraging to exceed these requirements.</p>	<p>The word 'minimum' is already underlined in recognition that this requirement does not set a target, but rather a minimum level. The first paragraph of the Executive Summary emphasises that requirements should be exceeded wherever possible.</p>	<p>No change required.</p>
<p>The way the Executive Summary is currently worded is specific to the developments. The target for all of this is surely developers and building owners. Amend text – perhaps before the table – to reflect this and to place it properly in context. Para 1.4 includes the same issue regarding who this is aimed at...i.e. it must point somewhere to developers and property owners.</p>	<p>The first paragraph of the Executive Summary makes it clear that the SPD is targeted at both applicants (including developers and owners) and decision-makers; and that it provides clarity about the minimum policy requirements both residential and non-residential development proposals must achieve and evidence in information submitted with planning applications in order to be approved. Paragraph 1.6 also clarifies the intended audience.</p>	<p>No change required.</p>

<p>The last statement in the table in the Executive Summary is weak and written in a negative manner. Whilst policies may not push too hard, surely an SPD can. Recommend this is amended, for example: Where planning permission is required, energy efficiency and low carbon heating improvements to existing buildings and extensions thereof must be considered. Proposals must be balanced against adverse impacts to local amenity or to the built, natural and historic environments (see Section 9).</p>	<p>Planning practice guidance is clear that SPDs cannot introduce new policy or 'musts', but rather provide additional detail on how the Council will implement existing policies in a Local Plan. There is no specific policy requirement in the Local Plan relating to the retrofit of existing buildings, so the SPD needs to achieve a careful balance between encouraging energy improvements in existing buildings, versus conveying this as a requirement. It is agreed that a balance needs to be struck between climate change benefits and any adverse impacts which cannot be overcome. Additionally, as the 2021 edition of Part L of the Building Regulations now applies to extensions as well as whole-building retrofits, the statement can be amended to make it clear that the Council supports energy improvements in extensions, as suggested.</p>	<p>Yes. Sentence amended to: "Where planning permission is required, energy efficiency and low carbon heating improvements to existing buildings and extensions thereof will be encouraged, with climate change benefits being balanced against any adverse impacts to local amenity or to the built, natural and historic environment where these cannot be overcome (see Section 9).</p>
<p>The following amendments are recommended: Para 1.1 "...not form <u>an enforceable</u> part of the Local Plan"</p>	<p>This is not considered to be necessary.</p>	<p>No change required.</p>
<p>Para 1.2 "...to the best of their effect in tackling the climate emergency and bringing about <u>and where possible exceeding</u> climate change objectives of the adopted Runnymede 2030 Local Plan."</p>	<p>Objective 6 of the Local Plan is to increase resilience to climate change, reduce greenhouse gas emissions, and promote the use of renewable and low carbon energy. The SPD aims to bring about this objective more effectively rather than exceed it.</p>	<p>No change required.</p>
<p>Para 1.3. "...Energy of the Runnymede 2030 Local Plan (the 'Local Plan'), by providing technical guidance on achieving <u>and where possible exceeding</u> energy and carbon emissions reduction standards and requirements to improve the environmental sustainability of <u>all</u> new development in the Borough."</p>	<p>Agreed. However, the SPD can only influence new development which requires planning permission.</p>	<p>Yes. Inserted 'and where possible exceeding' into paragraph 1.3.</p>
<p>Para 1.4 talks of major and non-major developments but the Executive Summary uses large and smaller scales. Recommend only one is chosen and defined, ideally that which exists in the LP. Para 3.2 introduces another set of</p>	<p>The variability is noted, but different references are required depending on the policy requirement being referred to. For example, all 'major' development proposals are required to</p>	<p>Yes. References to major and minor new development have been amended to 'major development proposals' or 'minor development proposals' to better reflect Local Plan</p>

development “categories” i.e. “Major; Minor; Extensions; Multiple; Stand alone” as such there are three throughout the document. These either need mapping in a table, or normalising into one approach. Section 9 Requirements - define “Minor redevelopment proposals”.	submit an energy statement, but ‘large-scale’ major development proposals (defined in footnote 1 of the SPD) are subject to additional requirements set out in Policy SD8, summarised in paragraph 2.18. To improve clarity, definitions will be added to the Glossary, and terminology will be changed to more closely reflect that of the policy requirements in the Local Plan.	language. Paragraph 1.5 signposts readers to new definitions provided in the Glossary, which now includes definitions for major, minor, householder and ‘non-major’ development proposals. The questionnaire at Appendix 1 has been amended to achieve consistency with these definitions, and to clarify the types of householder development proposal that would be expected to submit information via the questionnaire. Table 1 under paragraph 3.2 has been amended to also better reflect these definitions, and to improve clarity about which types of development can submit questionnaires, statements and/or Part L evidence.
Para 1.4 “...provide a questionnaire that in the non-major developments <u>should utilise in submissions in the stead of drafting energy information;</u> ”	Amendment agreed to improve clarity.	Yes, minor amendment to paragraph 1.4 as suggested.
Para 1.6 “...requiring applicants to consistently submit information <u>in a structured and consistent way</u> in order to demonstrate compliance with policy;”	Amendment agreed to improve clarity.	Yes, minor amendment as suggested.
Para 1.7. Only addresses new but the SPD applies to existing and extensions also. Wording needs tweaking. Consider referring to the Design SPD?	Agreed, amended to improve clarity and to signpost the Council’s Design SPD.	Yes. paragraph amended to also refer to retrofitted buildings and to the Design SPD.
Para 1.8 “...and low energy <u>consumption</u> ”.	Amendment agreed to improve clarity.	Yes, minor amendment as suggested.
Para 2.8. “Examples of mitigating climate change by reducing emissions include providing opportunities <u>for the increased utilisation of</u> renewable and low carbon technologies, providing opportunities for decentralised energy and heating, and promoting....”.	Amendment agreed to improve clarity.	Yes, minor amendment as suggested.
Para 2.9 County level policy is not referenced earlier in the document, it only covers local and national.	The document focuses on the implementation of the 2030 Local Plan, but signposts county-level policy to set out the context comprehensively.	No changes required.
Para 2.14. “...to drive the number <u>increase the proportion</u> of low carbon developments being delivered in the Borough...”. Para 2.17 “...this objective, but . Policy SD7 also contains a relevant policy criterion for energy reduction	Amendment to paragraph 2.14 agreed to improve clarity. Amendments to paragraph 2.17 and the policy insets are not considered necessary. A snapshot of the relevant criteria in Policy SD7 is provided ahead of concentrating	Yes, minor amendment to paragraph 2.14 as suggested.

which should be considered.”. Recommend switch the policy insets around to reflect 2.17 wording.	on Policy SD8, which is the primary focus of the SPD.	
Para 2.21 Recommend amend...”...A number of Government Approved Documents provide guidance....”	Amendment agreed to improve clarity.	Yes, minor amendment to paragraph 2.21 as suggested.
“...Multiple Building Developments: Evidence can should be provided for a sample representative of to show the different types of buildings and their positioning and solar orientation on the site”. Note the above should also include some sort of quantification method for evidence and measure/criteria for demonstrating policy achievement/alignment – to avoid it being a subjective judgement.	The guidance is provided to allow for multiple building development proposals to submit a representative sample rather than evidence for each and every unit (e.g. design-stage SAP assessment data). The case officer will need to see the plans on a case-by-case basis to decide what would constitute a satisfactory sample size.	Yes, text changed to ‘Multiple building developments’ and to provide clarity that a sample is acceptable instead of providing evidence for all units.
Section 5. Note the links to the Net Zero Toolkit do not work.	Noted.	Yes, all hyperlinks to the Net Zero Carbon Toolkit updated.
Section 5.7-5.15 and/or 5.21-5.25 - there is no mention in here for one of the most efficient methods of shading and cooling: trees. These maximise existing shade and introducing new shade.	Agreed. An additional paragraph will address these points.	Yes. Additional paragraph 5.26 inserted: “An additional key consideration is the multiple benefits of trees and tree planting. Well placed deciduous trees can increase the shading and natural cooling of buildings and spaces during the summer months and allow more natural light and heat to be received during the winter months when the leaves have fallen and when demand for heating and lighting is highest. Tree planting can also be used to shelter buildings from the wind and minimise unwanted cooling. The Green and Blue Infrastructure SPD Design Checklist prompts applicants to signpost how they have considered how trees species have been chosen that help cool spaces in the summer, provide solar gain in winter, and reduce rainwater runoff while contributing to biodiversity. Structural planting should be designed to create shelter from winds in winter and shade in summer.”
Appendix 1 – As this is for people not necessarily conversant with planning (at least in part), clarity could be improved by:	All suggestions are noted and some of the fields will be amended to improve clarity, although ‘Description of proposal’ is considered to be self-explanatory.	Yes. Application reference example expanded; date field inserted; links to further details about next steps inserted; question 1.b amended to refer to e-bike charging infrastructure;

<p>Adding an application reference and an example or explanation of what is being sought. 'Description of proposal' is too vague with only a brief example. Note that the size is perhaps more usefully a separate field. Include a date field. The addition of the approval stages and levels involved etc would be useful and informative to the audience. Part 2. 1b – add a question for charging e-bikes? Part 3. Recommend this prompts for clear statements if/where there are constraints to meeting compliance. If not done all that will be provided are instances of compliance which cannot be weighed overall. 7d. - add “visual.”</p>		<p>questions in part 3 now prompt applicants to describe any constraints to achieving passive design; reference to 'visual' impacts added to question 7.d.</p>
<p>Individuals including Members of the Public</p>		
<p>Local Councillor</p>		
<p>Add a definition for 'low carbon energy' the first time it is mentioned.</p>	<p>Agreed.</p>	<p>Yes. Footnote at paragraph 1.3 to refer readers to the Glossary, where 'Renewable and low carbon energy' is now defined, in accordance with the NPPF definition.</p>
<p>There are very few pages that do not refer to 'climate change' and/or the 'Net Zero Carbon Toolkit'. The Council should be explicit and call the SPD the 'Climate Change and Energy SPD', and include additional material which provides guidance on the implementation of policies which cover wider climate change issues.</p>	<p>The intention in preparing the SPD is to provide focussed guidance to applicants and decision-makers on the implementation of policy SD8, and on one energy-related criteria of policy SD7, to improve energy outcomes in new development. If other climate change issues were addressed in the SPD, the guidance would duplicate that already provided via other SPDs, particularly the Green and Blue Infrastructure SPD and Parking Guidance SPD. The guidance would also become very lengthy, which can be a deterrent to SPDs being used as they're intended. However, the title of the SPD will be amended to draw people's attention to its focus on climate change mitigation measures.</p>	<p>Yes. Title and all subsequent references amended to: "Energy & Climate Change Mitigation SPD".</p>
<p>Under the heat pumps section (paragraph 7.22), stress how important it is that they should be installed alongside underfloor heating (because they operate at low temperatures). Fitting units into homes with poor insulation and standard radiators will reduce their effectiveness.</p>	<p>Agreed.</p>	<p>Yes. The following bullet point added under paragraph 7.22: "As heat pumps provide heat efficiently at lower temperatures, they should be paired with low temperature heating systems such as underfloor heating systems, which usually have a flow temperature of 35°C</p>

		compared to <70°C demanded by gas boiler-fed radiators. If underfloor heating is not feasible/viable, then large radiators should be installed.”
Private Individual		
<p>The climate is changing and has always changed continually – this is caused by a number of factors, including depletion of the protective magnetosphere and excursion of the magnetic poles. The 2020 IPCC report finds little evidence that climate change is caused by anthropogenic carbon dioxide increase. The weather extremes being experienced today have happened historically since 1875, especially during the 1920’s and 1930’s. Unusual weather extremes are not caused by an increase in emissions, but by chaotic jet streams. The portion of emissions emitted by Runnymede is negligible compared to countries such as China, yet taking action to contribute to unnecessary carbon dioxide fossil fuel emissions reduction is costly for Runnymede’s residents. Eliminating fossil fuels will make the air cleaner but will have no effect on climate.</p> <p>Agrees that all new buildings need to be well insulated to save wasted energy and reduce costs to residents, but to state that the guidance will help address climate change, and a non-existent climate emergency, is to alarm and mislead the public. The approach taken by officers is not science-led, as the science proves that instead of trying to reduce temperatures, we should be trying to offset future natural drops in temperature as the Earth is pushed away from the sun with elliptical elongation.</p>	<p>Through the Climate Change Act 2008, and as a signatory of the Paris Agreement, the UK Government has committed to reduce emissions by at least 100% of 1990 levels by 2050; and contribute to global emissions reductions aimed at limiting global temperature rise to well below 2°C and to pursue efforts to limit temperatures to 1.5°C above pre-industrial levels. The National Planning Policy Framework sets out how Local Plans should take a proactive approach to mitigating and adapting to climate change in line with the objectives and provisions of the Climate Change Act. In accordance with national planning policy, guidance and legislation, the Council’s 2030 Local Plan therefore contains planning policies which support the transition to a low carbon future in a changing climate. The SPD has been prepared to assist applicants design policy-compliant new development, and for decision-makers to understand whether a scheme is compliant.</p> <p>As touched upon in the representation, by following the guidance in the SPD, co-benefits will be achieved alongside the mitigation of climate change, including reduced energy costs for occupiers and improved air quality. It is therefore considered that no changes are necessary to address these comments.</p>	No changes required.