

Appendix D to Local Plan Committee Report
Climate Change Supplementary Planning Document (SPD) Consultation (6 September – 4 October 2023)
Schedule of Representations

Who was consulted

Between 6 September 2023 and 4 October 2023, the draft Climate Change SPD was published for consultation in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The SPD was publicised through written / email consultations with statutory consultees, general consultees on our database, other relevant stakeholders, individuals and organisations who have expressed a wish to be consulted or have previously made comments, as set out in the Statement of Community Involvement. 7 organisations responded to the consultation. The table, below, summarises each representation and how it has been taken into account.

Respondent	Obj/Sup	Representation (summary)	Response
1. Introduction			
Natural England	Comment	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment	Noted
ECC	Support	ECC is very supportive and commends CCC on the content. ECC will continue to work with Colchester as it prepares its new local plan (and advice on planning applications) and provide ongoing advice through the County Council's Climate and Planning Unit.	Support welcomed
Historic England	Comment	I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on these and related documents.	Noted
National Highways	Support	National Highways do not have any comment on these above-mentioned SPDs.	Noted

Anglian Water	Support	<p>We support the Council's Climate Emergency Action Plan which sets out the actions that Colchester CC plan to take to reach net zero by 2030. However, the webpage only highlights the progress made rather than a direct link to the Action Plan and what specific measures are included, particularly which are linked to the Local Plan and new development – and how it links to the Essex Climate Action Commission's Net Zero report. You may wish to consider setting out what is needed for the Council's area as a whole to get to net zero and how the Local Plan policies and this SPD can contribute to that – not only in terms of the operational standards of new homes, but also the embodied carbon. We agree with the Essex Climate Action Commission's recommendations on a central approach to monitoring actions and understanding the necessary indicators, baseline position, and measures needed to evaluate progress. It is unclear whether successes are to be measured at LPA level or county-wide, but perhaps this can be clarified in the SPD to demonstrate how carbon reductions will be recorded and measured so the links to the Local Plan AMR and the respective climate/net zero strategies are clear.</p>	<p>These comments relate to the Council's Climate Emergency Action Plan and have been passed on to the relevant Officers.</p>
2. Background and Context - no representations			
3. Colchester context - no representations			
4. Improving Layout and Building Design			
Tiptree Parish Council	Object	<p>Increasingly it is recognised that everyone should have access to natural greenspace 'on their doorstep'. This need became particularly apparent during the COVID lockdown but is also needed to reduce the need for car journeys in order to find space for recreation. Unfortunately, these areas just outside the settlement boundary, even when designated as Local Wildlife Sites, are often the most at risk of speculative planning applications. We would like to see better protection for such sites of recognised value to the community and the SPD should be more strongly worded in support of the desire to protect such areas.</p>	<p>It is agreed that access to natural greenspace is important. Protecting and enhancing the city's green network and the 'creating a better environment' agenda will be the starting point and key</p>

			purpose of the Local Plan Review. The adopted Biodiversity SPD sets out the principles the Council expects to ensure that development proposals protect and create space for nature.
5. Renewable and low carbon energy			
Anglian Water	Support	Anglian Water is supportive of the policy approach and the SPD. Renewable and low carbon energy is important in reducing our own operational carbon, and we are on track to generate 45% of our energy from our own renewable sources by 2025 in our ambition to become net zero by 2030. We are achieving this by installing up to 238MWp of solar generation capacity on and around our sites, with a further 90GWh from renewable energy installations in our region between 2025 and 2030. In addition, we continue to generate over 115GWh of renewable power through our biogas CHP engines, including at our Colchester sludge treatment centre. We consider that the positive support for renewable energy in the SPD will help residents and businesses achieve their net zero aspirations. For Anglian Water, our renewable energy generation also provides a resilient energy supply to our critical infrastructure including our water treatment centres.	Support welcomed
6. Net Zero Carbon Buildings (the LETI approach)			
Anglian Water	Support	We welcome reference to LETI and its definition of net zero including whole life carbon including embodied carbon – we consider that this approach is important to tackle climate change and the carbon emissions of buildings and construction. The Built Environment Carbon Database states that the built environment is responsible for 38% of greenhouse gas emissions globally so there is a significant role for this sector in reducing carbon emissions. We support the section on measuring and reporting upfront embodied carbon on major development proposals, which we factor in on	Support noted. The Council will continue to monitor the impact of adopted Local Plan policies through the Annual Monitoring Report (AMR). The Council's progress in

		our own capital investment schemes. Will the Council be seeking to measure and monitor the impact the Local Plan policies and SPD have on reducing carbon emissions in new development to support its own net zero ambitions for the city council area?	meeting its net zero target will be reported separately (but referred to in the AMR).
7. Electric Vehicles - no representations			
8. Water efficiency measures			
Anglian Water	Support	<p>Anglian Water notes that the adopted Colchester Local Plan policy includes the optional higher water efficiency standard of 110 litres per person per day, which we have promoted across all local planning authorities within our region – with 54 of our 59 LPAs adopted or proposing to include this standard in their local plans. We are currently working with the Environment Agency, Natural England and Cambridge Water on a Joint Protocol for Water Efficiency which endorses the Government’s Environmental Improvement Plan intention to improve the building regulation water efficiency for 100 litres per person per day for water stressed areas, as a minimum – which can be addressed through water efficient fixtures and fittings. However the Joint Protocol will also to encourage local planning authorities to go beyond this towards 80 litres per person per day. We will be supporting the Joint Protocol with an evidence base that will be regularly updated as new data and information is published – including from the Ofwat Innovation Fund project we are leading with other organisations and developers – Enabling Water Smart Communities. Once agreed, the Joint Protocol will then be circulated to local planning authorities across our region to help promote and support a more ambitious approach to water efficiency and future growth in local plans.</p> <p>We fully support the SPD to encourage consideration of a lower water efficiency standard of 80 litres per person per day. We consider that such standards are achievable where integrated water management is implemented, and forms of water reuse are utilised (rainwater harvesting and reuse, and greywater recycling for example). Whilst individuals that make an environmental choice to install such systems into self/custom build</p>	Support welcomed. Information about the Joint Protocol is noted and will be considered as the Local Plan Review progresses. Reference to the Water Resources Management Plan has been added.

	<p>homes, it is most likely it will be larger sites where such integrated water management systems can be implemented in a cost-effective way, whilst also maximising the positive benefits of marketing water and energy efficient new homes. Economies of scale are likely to be achieved for larger major developments that implement integrated water management across the site utilising a centrally managed water reuse system linked to SuDS attenuation and/or greywater reuse. This would require a dual pipe system install to all properties so that non-potable water can be used for flushing toilets, outdoor use (car washing/watering the garden) and for washing machines.</p> <p>We agree that SuDS play a critical component in providing water efficient development through integrated water management measures. SuDS and green infrastructure need to be planned in at the start of designing new developments, particularly where attenuation is needed to support integrated water management through reuse in domestic and commercial properties.</p> <p>It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome references in the SPD to further guidance produced by Essex County Council, ensuring that SuDS are designed appropriately in new developments, until the Schedule is formally implemented and the necessary measures are in place.</p> <p>Page 33 Water efficiency measures: Anglian Water welcomes the references to water efficient fittings, rainwater harvesting systems and water reuse systems to further reduce potable water use, in addition to the link to our tips on water saving on our website. We consider that this particular section for householder development is useful for homeowners given the proportion of householder applications received by local planning authorities.</p>	
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		<p>Reference could also be made to our Water Resources Management Plan (revised draft version of WRMP24 available on our website for 2025-2050) in terms of the challenges that need to be met and how demand management is key to ensuring that we can meet future demands for water as a result of population growth, climate change and leaving more water to support the natural environment in our region.</p> <p>The Council could also consider including specific water efficiency guidance for non-household/commercial development in the SPD, which dependent on scale, can have significant rainwater harvesting potential for example.</p>	
9. Householder applications - no representations			
10. Conclusion			
Feering Parish Council	Support	Feering Parish Council think that, in principle, this document is a very aspirational and positive document	Support welcomed
ECC	Support	Further reading and references, page 36: Reference is made to the Essex Design Guide. This is not an “Essex County Council” publication but one that is managed and reviewed by the Essex Planning Officers’ Association on behalf of all borough, district, and city councils, including ECC. Where the Essex Design Guide is referenced, please remove ‘Essex County Council’. Likewise the Essex Green Infrastructure Standards were developed with Natural England, and while ECC played a lead role, this was done on behalf of all Essex borough, district, and city councils. The GI standards were launched in Summer 2023 and the recommendation is that each local authority adopts/endorse the standards, which have been approved by NE.	Noted, these references have been amended.
Anglian Water	Support	Anglian Water welcomes the ambitious measures included in the SPD which reflects the declaration of a climate emergency by Colchester City Council and providing further guidance to developers/applicants in meeting	Support welcomed

		and in some cases surpassing the requirements of climate change related policies in the Local Plan.	
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