Appendix C

creating a better place
for people and wildlife

Environment Agency

Ms Vicky Forgione,
Forward Planning,
Harlow Council Offices,
Civic Centre,
The Water Gardens,
Harlow,
Essex,
CM20 1WG

Your ref: Harlow Council Climate Change Strategy

Date: 2 December 2024

Dear Vicky,

Harlow Council Climate Change Strategy Consultation

Thank you for consulting us on the Climate Change Strategy document, prepared by Harlow Council. We have reviewed the document, and pleased to see that in Objective 4, that you will "Work with statutory bodies and interested parties on bringing forward improvements to the towns wetland areas" – therefore we look forward to and appreciate being consulted on these where applicable. We appreciate as well, the ongoing work to update flood amps and undertake more detailed flood modelling within the area. As a statutory consultee, we have a strong interest in the work that is planned to be undertaken in objective 4.

In order to support your work on this, please find below detail which may be of use within your supplementary planning document. There is also an annex attached with more detailed information.

The opportunity to promote climate change policies within Development Policies

Our latest Adaptation report, Living Better with a Changing Climate, **shows that England will inevitably face significant climate impacts, and that early action is essential.** The EA is preparing for climate impacts by working with government, businesses and communities. Significant climate impacts are inevitable especially for flood and coastal risks, water management, freshwater wildlife and industrial regulation. Despite more than a decade of concerted effort to reduce these risks, the speed and scale of climate change means that these remain significant and are increasing.

The levelling up and devolution agenda, including on-going policy reform presents an opportunity to strengthen the role the planning system plays in mitigating and adapting to climate change, and to ensure a fair transition to a low carbon economy. The LURA gives local plans, neighbourhood plans and spatial development strategies more weight when making decisions on applications. Therefore, seeking to secure opportunities to promote the inclusion of climate change policies within

DPs and to respond to their associated evidence bases, will be even more important. The Act also introduced a statutory requirement for LPAs to prepare local authority-wide design codes to set clear parameters for development in their area, providing a further opportunity to incorporate specific climate resilience measures into development.

The Environmental Improvement Plan (EIP) has 10 goals for the environment. Goal 7 highlights the Government's ambition to take all possible action to mitigate climate change, while adapting to reduce its impact. It states that whilst we aim to limit global warming to 1.5 degrees, evidence shows that we must be prepared for warming up to 4 degrees. The EIP will inform changes under the LURA and links to wider government policies and programmes, such as the third National Adaptation Programme and the Plan for Water, see Annex 1, para 1.3.

Many councils across the UK have passed motions to declare a climate emergency, including setting ambitious NZ targets. Councils are seeking to translate these high-level aspirations into policy and practice. Further action is required to ensure that our transition to NZ is also resilient to climate impacts.

Using local impacts evidence to identify location specific vulnerabilities

Local evidence of climate change impacts can be valuable in identifying location specific vulnerabilities. Sustainability Appraisals (SAs), including Strategic Environmental Assessment (SEA), should include evidence and objectives to support a strong policy approach to mitigate and adapt to climate change. Evidence bases relating to flood risk and coastal change include:

- Strategic Flood Risk Assessments (SFRA) are crucial evidence documents for understanding the impacts of climate change on all sources of flood risk over the anticipated lifetime of development proposed in DPs.
- Our Climate Change Allowances (CCAs) inform SFRAs and have been updated to reflect UKCP18. The three main components are peak rainfall intensity, peak river flow and sea level rise. They support understanding of flood risk and inform drainage design, providing a framework for resilience to a 4°C increase by 2100. Internal CCA information is available here.
- The National Coastal Erosion Risk Map (NCERM) shows coastal erosion rates for the short, medium and long term. These are complemented by Shoreline Management Plans (SMPs), Integrated Coastal Zone Management Plans and Shoreline/Coastal Strategies.
- SMPs take a strategic approach to managing combined hazards of erosion and flooding in coastal areas in England up to 2105, taking into account the likely impacts of climate change. The SMPs Explorer visualises the 20 SMPs covering the English coast using the latest climate change evidence.
- The National Flood Risk Assessment (NaFRA) is being updated and is scheduled to be published in August 2024. NaFRA2 will help places better plan and adapt to future risk from flooding from rivers, the sea and surface water. More information can be found on the NaFRA2 SharePoint page.

SFRAs bring together information on a range of sources of flood risk and coastal change and how they will be affected by climate change. They use the CCAs, the NCERM and SMPs to form a comprehensive understanding of flood risk and coastal change for a local authority area.

Localised evidence bases relating to water resources and quality include:

- Water Cycle Studies and Infrastructure Delivery Plans are important for informing water resources and water quality policies.
- River Basin Management Plans (2022) aim to protect and improve the quality of our water environment, including enhancing nature and natural water assets. These plans recognise the necessity of allowing species to migrate, adapt and increasing the resilience of wetland and water-based habitats and species to address the pressures from climate change.
- Water Resources Management Plans (WRMPs) assess pressures on future water supplies. WRMPs are an essential evidence source for ascertaining water availability within the context of climate change. A summary of England's draft regional and WRMPs is provided here.
- Water company drainage and wastewater management plans account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act has made these plans statutory, collaborative and should integrate into long term planning documents.
- Integrated water management studies, which include surface water flood risk, and are particularly relevant in urban growth locations.
- EA evidence on Water Stressed Areas can be used to justify recommendations for tighter water efficiency requirements within new build.

Evidence bases relating to nature recovery and climate change include:

- Local Nature Recovery Strategies (LNRS) will identify locations to create or improve habitats to provide the greatest benefit for nature and the wider environment, including contributing to the mitigation, and adaptation to climate change, for example through the potential measure of planting trees or restoring upland peat. A key source of evidence for LNRS is through the LNRS Data Viewer.
- Local green and blue infrastructure plans and strategies provide a holistic evidence base which can help maximise opportunities for achieving multiple benefits for the environment. They include measures to protect and enhance biodiversity, alongside adaptation priorities and opportunities. For example, the Hinckley and Bosworth Green Infrastructure Strategy (2020) integrates climate change as a key driver for the provision of green infrastructure, recognising contributions to carbon sequestration, greenways for active and low carbon travel, flood risk alleviation and reducing the urban heat island effect.
- Local Biodiversity Actions Plans (BAPs) are strategic documents created to protect and enhance biodiversity in a specific area. While the primary focus is biodiversity, they often recognise the interconnection between biodiversity and climate change. The Royal Borough of Kensington and Chelsea BAP 2022-

2027 integrates climate change measures and actions to manage habitats in a sustainable way that is resilient to climate change.
- NE's Re-evaluating the sensitivity of habitats to climate change (2023) provides evidence to support nature conservation in a changing climate. It is a helpful guide for identifying habitats vulnerable to climate change including montane, freshwater, wetland and coastal habitats. The document also outlines approaches to manage species vulnerabilities.

Our overarching Climate Ambition

Our Climate Ambition is to create a NZ nation that is resilient to climate change. Our broad remit means we are well positioned to see and respond to the urgency of the climate challenge. We help the country better understand and be prepared for climate impacts. We lead on managing and responding to a wide range of risks associated with too much and too little water. We also have a vital role in tackling climate risks to freshwater habitats and species. And we are on the front line in supporting communities to prepare for and respond to extreme weather and sea level rise.

The EA's third adaptation report sets out how the impacts of climate change affect our work. We are an important delivery body for local adaptation, through our flooding, environmental management and planning roles. We work with local government and communities, being well placed to see how the climate risks they face interact. We aim to embed adaptation throughout our work by:
- Preparing for current and future impacts;
- Securing investment in climate resilient net zero infrastructure and places;
- Changing how we do things, including regulation and planning advice.

Our main contribution to the Government's NZ target is as a regulator of major energy and industrial sectors, and advisor. Our ambition is to play a part in ensuring resources are used efficiently, as well as enabling a more circular economy, all of which contribute to reduced GHG emissions. Our role is not to enable NZ at the expense of a high quality, resilient environment, rather it is to work with stakeholders to ensure that decarbonisation is delivered in a way which protects and enhances local environments, and understand the further environmental constraints that a changing climate will bring, for example in relation to water availability.

The Climate Academy provides resources relating to our climate change work, including our climate ambition and Living better with a changing climate report. Our role is critically about protecting the environment, as part of our overall sustainable development role. It is for that reason that we want to:
- encourage LAs to consider the impacts of a changing climate - notably in relation to flood and water risks and opportunities to support nature recovery.
- encourage LAs to ensure that their transition to net zero is good for nature and is resilient to the changing climate (not dependent on water that will not be available or exacerbating flood risk).

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Residential developments
The supply of water in the area is under serious water stress (as identified in our report: Water stressed areas – 2021 classification). All residential developments must therefore achieve the higher water consumption efficiency standard of 110 litres per person per day, as set out within the Building Regulations &c. (Amendment) Regulations 2015.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent.

Final comments
Thank you for contacting us regarding the above supplementary planning document. Our comments are based on our available records and the information submitted to us.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

[Name]
[Title]

Email: HNLSustainablePlaces@environment-agency.gov.uk
Direct Dial: [XXXX]

Annex 1

1.1 Flood risk

As articulated within the FCERM Strategy, we want to ensure that resilience to climate change is embedded in all new development, so that today's places and infrastructure are resilient to tomorrow's climate. Specific flood risk policies/outcomes we wish to see delivered through DPs include:

- **Avoiding inappropriate development and steering development to areas with the lowest risk of flooding**, through applying the sequential test to site allocations and spatial policies. Where avoidance is not possible, ensure development is designed to be appropriately resilient throughout its lifetime, without increasing flood risk elsewhere. Avoidance is the most effective way of preventing flood damages and reduces a future need for costly and often carbon-intensive flood defences and pumped drainage systems.
- **supporting opportunities to incorporate natural flood management approaches**, such as river restoration, protection of existing natural assets and the use of green and blue infrastructure. Policies that discourage culverting or canalisation of watercourses.
- **supporting riverside improvements which achieve multiple benefits**. For example, where improvements and / or replacements to flood defences are planned, provide wider landscape or environmental benefits, such as improved public spaces and the creation of new habitats.
- **maximising opportunities presented by development design to reduce the impacts of flood risk**. For example, by increasing permeable surfacing, reducing run-off or making space for water.
- **safeguarding land likely to be needed for future flood or coastal risk management infrastructure**, such as larger or set-back defences or flood storage areas.
- **ensuring new development will not place additional burdens on emergency planning/services provision**. Policies and allocations should ensure development is located and designed to enable access and escape during flooding. Where additional burdens would be introduced as a result of development, developers should be expected to cover these costs through commensurate contributions.
- **where necessary and supported by evidence, Local Plans should consider opportunities to promote the relocation of development, including housing to more sustainable locations**. Where climate change is expected to increase flood risk, in some locations existing development may not be sustainable in the long term.

Encouraging the use of multifunctional SuDS, including on smaller-scale developments remains an outcome we still wish to see delivered in DPs**.** We encourage policies which set out the locations where types of SuDS will and will not be appropriate, to maximise their benefits and minimise risks. SuDS can help address climate change by reducing flood risk, ameliorating urban heating, enhancing biodiversity and relieving pressures on water resources. SuDS also have

a lower embodied carbon than conventional drainage systems and can sequester carbon throughout their lives.

In January 2023, Defra announced its intention to implement Schedule 3 of the Flood & Water Management Act. Its implementation (planned for 2024) will change the role of the planning system on SuDS and alter the approach Local Plans should take on this topic. The approach needed will depend on the timings of the Local Plan relative to the implementation of Schedule 3 and final details as to how Schedule 3 will be implemented. However, the above principles should continue to be encouraged in DP policies ahead of outcomes of the Schedule 3 implementation.

Further information

- Joint EA/ADEPT guidance on FR Emergency Plans for New Development.
- The Working with Natural Processes evidence base contains information on natural flood management, including differing techniques and maps.
- Mapping the potential for working with natural processes shows areas where there may be an opportunity to implement particular techniques.
- Spatial prioritisation of catchments suitable for using natural flood management identifies catchments where measures that slow the flow of water are likely to provide the greatest flood benefits. These maps should be used as a guide, supplemented with local knowledge.
- Guidance on using NbS to reduce flood risk in your area.
- Planning Practice Guidance - flood risk and coastal change provides guidance on assessing the impact of climate change on flood risk for plans and developments, promoting natural flood risk management approaches.
- ADEPT Strategic flood risk assessment good practice guide supports EA guidance on 'how to prepare a strategic flood risk assessment' and Government guidance on applying the sequential test and exception test.
- To note, SuDS can count towards BNG, as set out in developer guidance.

1.2 Water resources and water quality

England's water environment is under threat. After more than 200 years of rapid economic human development, most of our waters are not in their natural state. A lot has improved in the last 30 years. But the pace of change is not enough, particularly in the light of the challenges of climate change, population growth and new and emerging risks including chemicals. We recognise the scale of the challenge and the critical interdependency of how we manage water along with food production, land management and energy. The EA is working strategically to manage current and future water environment challenges, adopting a long-term planning approach in the face of climate change.

The EIP launched a roadmap to water efficiency in new developments and retrofits, to be delivered over the next decade. This was reiterated in Government's Plan for Water (2023) which includes a commitment to 'consider mandating a new minimum water efficiency standard for new homes in England of 105 litres per person per day and 100 litres per person per day where there is a clear local need, such as in areas

of serious water stress'. This plan affirms that climate change is worsening the pressures to our water supply and water environment.
In December 2023, through a Written Ministerial Statement, Government announced that in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, LPAs are encouraged to work with the EA and delivery partners to agree standards tighter than the 110 litres/person/day that is set out in current guidance. Current planning guidance states that all new homes have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day), but where there is a clear local need, LPAs can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. Government is planning to review the relevant building regulations in 2024 to allow for tighter water efficiency standards to be set and considering the competence and skills to enable this transition as outlined in the Plan for Water Roadmap.

The NPPF's policies expect LPAs to adopt proactive strategies to adapt to climate change, taking account of water supply and demand considerations. Key policy asks relating to increasing water efficiency within new build are integrated into the checklist. These are accompanied by the more detailed points below.

We encourage grey and rainwater harvesting policies for new developments, designed at an appropriate scale and potentially determined on a case-by-case basis. These could help to create places resilient to climate change, contribute to achieving NZ emissions and reduce the demand for water. Systems must be reliable for users and so their impact can be accounted for in water resources and flood risk management plans. Further information is available from Waterwise which has shown that the policies to encourage grey and rainwater harvesting for new development have the most net benefit and we support this position.

We wish to see an early consideration of the water supply and sewerage infrastructure required to support climate resilient growth. For example, through evidence/commitment of water companies to ensure adequate supply, water efficiency and treatment, conveyance and environmental disposal capacity is planned for and available. There should be an assumption against the proliferation of private sewage treatment systems and private water supplies.

We strongly encourage LPAs to set out water policies that reflect the requirements of River Basin Management Plans (RBMPs) and Water Framework Directive (WFD). RBMPs aim to facilitate immediate and necessary action to tackle climate change through mitigation and adaptation actions. Healthy water-dependent habitats are essential for wildlife and provide resilience to climate change by regulating flooding, erosion, sedimentation, local climates, carbon sequestration and water quality. Further details can be found in the RBMP Topic Action Plan on climate change.

The WFD needs to be considered throughout the development of a Local Plan. Catchment and RBMPs water quality priorities should also be reflected in strategic planning documents. NPPF paragraph 180 (e) promotes the use of the RBMPs to enhance the environment. LPAs have an important role in implementing the WFD,

making sure new development does not cause deterioration and whenever possible supports measures to improve water bodies. NbS can help deliver improvements to water quality and WFD objectives.

Further information:

- CIRIAs Delivering better water management through the planning system
- **EA Cooling water guidance** is being developed. Any project which requires cooling water abstraction will need to take into account this guidance to understand the key environmental risks associated with cooling water and the permitting required at each site.

1.3 Nature-based Solutions (NbS) and Natural Capital Approaches

DP policies should enhance biodiversity, whilst also contributing to mitigating and adapting to climate change. Nature needs to play a key role in tackling the climate emergency: climate change and biodiversity loss are closely inter-linked challenges that need to be tackled in an integrated way. The Government's 25 Year Environment Plan, Nature Recovery Network, Local Nature Recovery Strategy and Biodiversity Net Gain approaches can help to deliver for both biodiversity and climate change. The Government's EIP identifies NbS as a mechanism to bring together our environmental and net zero goals, including biodiversity loss.

We should encourage policies that seek to include NbS as a requirement for development to ensure the protection and enhancement of nature, enabling green growth. The role of NbS is founded on the principle that where an ecosystem thrives, it provides valuable services and benefits to society. NbS provide a range of benefits in tackling climate change, including by:

- expanding natural carbon sinks such as forests, peat bogs, and coastal/terrestrial wetlands.
- preventing further nature loss and providing resilience against climate impacts such as sea-level rise, flooding and extreme weather events.
- protecting built assets, e.g. concrete flood defences by moderating stresses they are subject to and improve their climate resilience/longevity.

Further information:

- NE's Natural Capital Atlases: Mapping Indicators for County and City Regions provide a natural capital evidence base for each county or city region and can help highlight habitats vulnerable to climate change. The second editions have been updated to include catchment services associated with freshwater but are provided by the land across the wider catchment: water supply, regulation of water quality and flood protection.
- The Tees Valley Nature Partnership have published a report which explores how local planning can be informed by natural capital accounts and atlases. PAS note that this provides a great starting point to build up a comprehensive natural capital evidence base to support decision-making.

We encourage LPAs to use a natural capital approach to prioritise the use of NbS within DPs. A natural capital approach – understanding that nature underpins

human wealth, health, wellbeing and culture – underpins the delivery of both biodiversity and environmental net gain. By creating bigger, better and more connected natural assets, we improve the resilience and flow of ecosystem services, and the benefits society receives from them. Ecosystem services are functions and products that flow from natural assets and provide benefits to people. For example, ponds, reed beds and woodlands absorb carbon and help mitigate the effects of climate change by slowing floodwater and cooling the air.
Specific tools which can support a natural capital approach include:

- registers and accounts that systematically quantifies the natural assets in a place, the flow of services and the value of the benefits;
- metrics for ecosystem services to inform options appraisal, build better business cases for investment and support quantitative reporting of environmental gains and losses; and
- identification of potential investment routes to enable delivery of climate adaptation and mitigation measures.
- Local nature recovery strategies (see para 1.5 below) also provide a framework to help LPAs prioritise the use of NbS.

Further information:

- Government guidance for Enabling a Natural Capital Approach (ENCA). ENCA features tools for assessing natural capital and environmental valuation. This site details the various natural capital tools, including the Natural Capital Register and Account Tool.
- The EA's Natural Capital Register and Account Tool contains the tool, supporting reports, guidance and a training video. It can be accessed from the Natural Capital team by emailing naturalcapital@environment-agency.gov.uk. This team can be contacted both internally and externally if LPAs wish to make contact directly.

1.4 Local Nature Recovery Strategies (LNRS)

LPAs are encouraged to make clear links to the opportunities for addressing climate change, as part of a holistic approach to nature recovery. We recommend the prioritisation of NbS to help tackle the nature and climate crisis.

LNRS are a new England-wide system of spatial strategies, designed to support the restoration of nature by mapping opportunity areas for enhancement. LNRS are strategic plans for nature and wider environmental improvement. Government expect that each LNRS will support the delivery of a number of national environmental objectives. These include climate change as a cross cutting priority for an LNRS stating "all LNRSs should consider the anticipated impacts of climate change throughout their preparation to help biodiversity and the environment in their area to adapt to future changes".

LNRS will be an important part of a Local Plan evidence base, and can be used to identify opportunities for habitat creation or enhancement that provide multiple benefits, including mitigating or adapting to climate change.

Responsible Authorities are encouraged to use the latest climate evidence to gain a better understanding of localised risks and vulnerabilities within their LNRS area. LPAs should maximise opportunities to link work on relevant LNRSs to inform evolving local plans and their supporting evidence base. For example, Cornwall Council's pilot LNRS makes strong link to informing their spatial plans, with the LNRS being considered a material consideration to inform planning policy. Please note, the LURA 2023 states that local plans, minerals and waste plans, neighbourhood plans and spatial development strategies must take account of any LNRS that relates to all or part of the LPA area.

1.5 Biodiversity and Environmental Net Gain

Local plans should set out Biodiversity Net Gain (BNG) policy requirements, including those that help tackle climate change such as NbS. BNG is an approach to development which aims to leave nature in a measurably better state than beforehand. It is recognised as a powerful way to deliver wider outcomes that benefit the environment, wildlife and people. BNG offers considerable scope to help create resilience places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks. It is expected that Local Nature Recovery Strategies will be used to help inform how and where BNG should be delivered. The BNG Advice Note sets out the requirements for integrating BNG into DPs.

Environmental Net Gain (ENG) extends beyond BNG, expanding on net gains for biodiversity to deliver wider benefits, such as improved air and water. Whilst there is no planned mandate for ENG, it should be encouraged as the approach offers additional opportunities to tackle climate change.

The NERC Act 2006 establishes a general duty on public authorities, to conserve and enhance biodiversity through the exercise of its functions. This has strengthened the original NERC duty from having regard to the conservation of biodiversity, to conserve and enhance biodiversity. As a public body, seeking strong biodiversity and BNG policies, and encouraging ENG policies in local DPs, helps the EA to fulfil this duty.

Further information:

- The Government's Local nature recovery strategy statutory guidance sets out what a responsible authority should include in their LNRS, including how the strategies can include NbS to address wider environmental issues. The LNRS Data Viewer includes key data related to climate change.
- Natural England's (NE) Green Infrastructure Framework contains principles, standards, maps and a planning and design guide. Principle 5 of the Framework focusses on 'resilient and climate positive places'.
- The Essex Climate Action Commission: Land Use & Green Infrastructure provides a useful overview of the funding for land use and green infrastructure action programmes.

- The UK Green Business Council's Nature Recovery & Climate Resilience Playbook (2022) is a resource designed to support biodiversity recovery and climate resilience, using NbS, including for informing planning policy.

1.6 Waste and the circular economy

Waste & Minerals Plans and Local Plans (alongside supporting documents such as evidence reports) should promote approaches that support the transition to a more Circular Economy (CE) and the Waste Hierarchy (WH). This can be achieved through the promotion of waste reduction, reuse and recycling in an integrated way. In considering these aspects, plans should be working towards reductions in energy use and conservation of resources.

Key drivers are the Government's 25 Year Environment Plan, the Resources and Waste Strategy (R&WS) and the Waste (CE) (Amendment) Regulations 2020, which includes a chapter on waste planning. This should be useful in considering the latest thinking and legislative framework for establishing a future waste management trajectory. The EIP includes the latest targets and commitments to maximise our resources and minimise waste, building on the 25 Year Plan. The CCC's Sixth Carbon Budget (Waste Sector Summary) also includes some key statements relating to maximising recycling rates.

Key policies that we support include:

- **Upstream interventions that promote longevity**, extending the life of products i.e. policies that support repair cafes, reuse libraries etc.
- **Policies that support separate handling and logistics, once a product has reached the end of its first use**. It is important that the systems in place have sufficient capacity to support reverse logistics (take back) for refurbishment, remanufacture and disassembly.
- **Policies that identify key waste streams where the biggest environmental gains can be made, prioritising action to promote the principles of circularity and the WH**.
- **Encourage design standards for new housing and infrastructure, which promote the separation of products for reuse and remanufacture etc**. We recommend that these are also aligned for reverse logistics, include community scale storage and neighbourhood facilities that promote repair, reuse and separate collection.
- **Encourage community and third sector involvement through the development of community networks which stimulate activity to reuse, repair etc., promoting more inclusive and resilient communities**. An example of making better use of surplus products rather than disposing of waste is here The Company Shop Group.

Further information: EA data for waste management activities

1.7 Heat networks and Energy from Waste

DPs can play an important role in promoting patterns of development that enable the creation of heat networks. This is particularly relevant when LPAs consider site allocations. Any heat source should be considered for connection to the heat network. Examples include Energy from Waste (EfW), landfill gas and those arising from large utilities or industry.

When developing policy relating to heat networks, we recommend that consideration is given to the policy section within the DEFRA Energy from waste: A guide to the debate document. This outlines four key principles underpinning current thinking on EfW. We particularly note the importance of maintaining the waste hierarchy and the precedence to reduce or mitigate the environmental impacts of waste management.

The CCC Sixth Carbon Budget (waste Annex) includes an EfW statement that should be considered when developing policy. This states that by 2040, EfW should be fitted with Carbon Capture Utilisation and Storage (CCUS). CCUS is a method of removing carbon dioxide from industrial emissions to the atmosphere. It is an important element within the Government's plan to decarbonise industry and is being taken forward through Industrial Clusters. It would therefore be appropriate to consider the practicalities for CCUS in relation to EfW.

Topic specific information not reflected within the checklist is provided below.

1.8 Blue Carbon: Estuarine and coastal benefits

We support policies that protect, restore and enhance marine and coastal habitats, recognising the carbon sequestration and wider multiple benefits they provide. The UK has over 30,000km of coastline and coastal waters, a good deal of which has potential to help tackle climate change. This is by virtue of the services that 'healthy' marine and coastal ecosystems provide, such as natural flood management and carbon sequestration known as 'blue carbon'. Habitats such as seagrass beds and saltmarsh offer a potential carbon offsetting tool towards national NZ targets.

Further information:

- Restoring Meadow, Marsh and Reef (ReMeMaRe) is a habitat restoration initiative. A range of tools, maps and handbooks are available there.

1.9 Air Quality

We support DP policies aimed at improved efficiency and compliance by regulated facilities and decreased emissions from non-regulated facilities. Climate change is contributing to air pollution by changing atmospheric chemistry, increasing the risk of wildfires, and driving increasing emissions of ammonia from agriculture and natural sources. Improved efficiency of regulated industry will decrease emissions of pollutants, as well as GHG emissions, in particular carbon dioxide from combustion.

We support the ambitions of the Clean Air Strategy (2019) and are working with stakeholders on implementing its key proposals. The EIP 2023 sets out the actions the Government are taking to build on the Clean Air Strategy and make further improvement for our health and wellbeing. Through our regulatory role, we are reducing emissions from industrial activities and improving air quality. Our Local Authority Unit is working on guidance to support the improvement of regulatory performance by Local Authority-regulated smaller industries, including their emissions to atmosphere.

DP policies requiring the use of efficient, low emission and up-to-date plant for non-regulated units (and enforcement of Local Authority-regulated industry) will support both improved air quality and reduced GHG emissions. We recommend policies that:

- encourage the application of energy efficiency measures and latest technology for non-regulated developments. For example, stand-by generators or gas engines for commercial units or district heating for housing developments.
- highlight the statutory requirements, under the Environmental Permitting Regulations (EA and Local Authority regulated sites), to apply Best Available Techniques for all industrial activities; and the need for operators to respect permit conditions, including the yearly reporting of emissions.

Final comments

Thank you for contacting us regarding the above documents. Our comments are based on our available records and the information submitted to us. We hope the above comments are useful and welcome continued engagement in the preparation of your local plan.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Ms Frankie Mansi
Planning Advisor

Email: HNLSustainablePlaces@environment-agency.gov.uk
Direct Dial: 020 3025 2622