

Local Plan 2021-2041

**Tackling Climate Change
Background Paper**

March 2024

Herefordshire Local Plan Policy Background Paper – Tackling Climate Change

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1. Introduction

In consideration of both the existing Local Plan evidence base and public consultation responses so far, this background paper sets out the key issues relating to climate change that affect the county of Herefordshire and the preferred policy approach for addressing these in the Herefordshire Local Plan.

This paper will begin by providing some background on the topic of climate change, setting out what is required to tackle it on an international scale and how this relates to the local context of Herefordshire. It will then outline the legislative context and both the national and local policy context, guiding actions to tackle climate change. The following section of this report outlines how the Local Plan’s vision and objectives link to the topic of tackling climate change. Following this will be detail about Herefordshire-specific issues in relation to climate change, information on the

key points raised in each of the public consultations on the Local Plan conducted so far and important facts from the evidence base. The penultimate section of this report will provide a justification for the preferred policy approach taken for *Policy CC1: A carbon neutral Herefordshire* in the Local Plan. The final section will outline the next steps for the Local Plan, looking ahead to any additional evidence required to support its production concerning the topic of climate change and providing an indication of the preferred policy approach.

2. Background

Climate change is the greatest challenge facing our society. The Intergovernmental Panel on Climate Change (IPCC) have [made it abundantly clear](#) that, if catastrophic climate change is to be averted, then radical reductions in carbon emissions are needed within a short timescale. While catastrophic climate change may still be avoidable, it is important to recognise that we are already locked into a significant degree of global heating which will make extreme weather events such as flooding, overheating and drought more prevalent. This means that we will need to re-engineer the built environment to help communities to adapt to its long-term impacts.

In recognition of the urgency of the matter, Herefordshire Council declared a climate emergency in March 2019, which was later strengthened to a climate and ecological emergency. The council committed to achieving net zero carbon emissions by 2030. This declaration reflects the council's recognition of the dangers posed to Herefordshire's residents by climate change and the responsibility it has to protect people from its impacts. This declaration was reaffirmed in July 2023.

In respect of climate change, there are two priorities for the council: i) to use its influence to radically reduce carbon emissions across the county; and ii) to implement changes to the built environment that support communities in adapting to both current and future impacts of climate change. The Local Plan will play a key role in addressing both of these priorities.

Herefordshire's carbon footprint amounts to [1,998kt CO₂e](#) (2019). Agriculture (26%), transport (28%), housing (21%) and the industrial and commercial (21%) sectors are the largest contributors to the county's carbon footprint. Therefore opportunities to reduce emissions in these areas should be prioritised.

The impacts of climate change are already being felt around the world and will increase in severity in future no matter how quickly carbon emissions are reduced. In 2021, the government's [Climate Change Committee](#) highlighted what it considers to be the major priorities for further adaptation. It highlighted a number of considerable risks: to soil health from increased flooding and drought; to natural carbon stores and sequestration from multiple hazards; to crops and livestock, to the supply of food and goods for vital services, and risks to human health, wellbeing and productivity.

Herefordshire's new Local Plan will address the issues outlined above by setting policy requiring development to incorporate design measures to reduce carbon emissions, such as by installing and connecting to renewable energy technologies, connecting to safe and accessible walking, cycling and wheeling routes to reduce dependence on the private car, and incorporating green and blue infrastructure into schemes to sequester carbon from the atmosphere. Policy can also require developments to be designed to be resilient to the impacts of climate change over their lifetime.

3. Policy and legislative context

3.1 Legislation

Levelling Up and Regeneration Act 2023

Schedule 7 (15C) of the Levelling Up and Regeneration Act (LURA) 2023 (which amends Section 19 of the Planning and Compulsory Purchase Act 2004) requires that:

'The Local Plan must be designed to secure that the use and development of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'

This obligation makes clear that Local Plans must contribute towards meeting the carbon reduction target set by the national carbon budget of 78% by 2035 and net zero by 2050 target.

Climate Change Act 2008

The Climate Change Act 2008 includes a statutory target to reduce UK carbon emissions by at least 100% by 2050, compared to 1990 levels. To help achieve this, it sets five-yearly 'carbon budgets' for the UK.

The Act also requires UK Climate Change Risk Assessments which set out the latest evidence on the risks posed by climate change. The most recent of these was published in [January 2022](#).

The outputs from the Climate Change Act can provide an evidence base that can be used to identify priorities for action at the local level. The carbon budget is also directly related to the Local Plan.

Environment Act 2021

This introduced many of the ambitions set out in the [25 Year Environment Plan](#) into law, such as the requirement for development to achieve a 10% net gain in biodiversity. The Act also introduced Local Nature Recovery Strategies, which are spatial strategies for protecting and enhancing the natural environment and nature-based solutions for helping to address climate change.

Flood and Water Management Act 2010

This Act addresses both flood risk and water scarcity. It aims to minimise the impact of flood events and established the role of Lead Local Flood Authorities, which are local authorities responsible for managing local sources of flood risk in their regions, such as surface water run-off, groundwater and ordinary watercourses.

Planning Act 2008

This was introduced to speed up the process for approving Nationally Significant Infrastructure Projects (NSIPs) such as large-scale renewable energy schemes (greater than 50 megawatts).

Planning and Energy Act 2008

This Act introduced powers for local authorities to require a proportion of the energy used in relation to new development to be sourced from renewable and low carbon sources local to the development area. It also enabled local authorities to require building energy efficiency standards that exceed those required by Building Regulations.

Neighbourhood Planning Act 2017

While strengthening the powers of neighbourhood plans, this Act requires local authorities to set out the strategic priorities for their area. This approach is important for tackling climate change as it supports longer-term planning on issues such as renewable energy and adaptation to its impacts.

3.2 National policy

National Planning Policy Framework

The [National Planning Policy Framework](#) (NPPF) sets out the key national planning priorities for England. First published in 2012, it was most recently updated in 2023, and is an important consideration for local planning authorities when producing local development plans and making planning decisions.

Paragraph 157 of the NPPF states that *“the planning system should support the transition to a low carbon future in a changing climate...It should help to: shape places in ways that contribute to radical reductions in greenhouse emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”* Paragraph 158 continues by underlining the responsibility of local authorities to take a proactive approach to mitigating and adapting to climate change. In relation to tackling climate change the NPPF includes policy on:

- achieving sustainable development;
- climate change mitigation, renewable energy generation and sustainable energy use;
- mitigation and transport emissions; and
- adaptation to climate change.

In the December 2023 revision of the NPPF, a new paragraph (164) relating to climate change was added: *“In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”*

Planning Practice Guidance

The Planning Practice Guidance provides additional guidance on aspects of the NPPF. In relation to tackling climate change, relevant sections include those titled:

- [Climate change](#);
- [Air quality](#);
- [Renewable and low carbon energy](#);
- [Flood risk and coastal change](#);
- [Waste](#); and
- [Water supply, wastewater and water quality](#).

25 Year Environment Plan

Published in 2018, the 25 Year Environment Plan is the Government’s plan to improve England’s natural environment, setting out their approach over a 25 year period. It sets a range of targets to improve the quality of the natural environment, including on improving air and water quality, supporting the thriving of plants and wildlife, reducing the risks of harm from environmental

hazards, using resources from nature more sustainably and efficiently, enhancing beauty, heritage and engagement with the natural environment, mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.

UK Clean Growth Strategy

Under the Climate Change Act 2008, the UK Government is required to publish a set of policies and proposals to ensure that the UK meets its legally-binding carbon budgets on the way to net zero by 2050. The Clean Growth Strategy sets out the Government's plans. The strategy presents a comprehensive set of policies and proposals to help accelerate the pace of 'clean growth'. These include policies to improve business and industry efficiency, improve energy consumption in homes, accelerate the shift to low carbon transport, deliver clean, smart and flexible power, enhance the benefits and value of the UK's natural resources, reduce carbon emissions in the public sector, and demonstrate Government leadership in driving clean growth.

Future Homes Standard

From 2025, the Future Homes Standard will introduce mandatory changes to Part L and Part F of Building Regulations for new residential dwellings, which aim to ensure that all new-build homes will produce 75-80% less carbon emissions than homes built under current Building Regulations. The standard aims to decarbonise new homes by focussing on improving heating and hot water systems and reducing waste heat.

3.3 Local policy

County Plan 2020-2024

Herefordshire Council's County Plan 2020-2024 is the key strategic document for the council that outlines the ambitions and objectives over a four year period and highlights how those ambitions will be delivered. The ambitions it sets out fall under three headings: 'Environment', 'Community' and 'Economy'. Of particular relevance to climate change, the council has committed to:

- consider the impact of climate change and the opportunity for carbon reduction in every aspect of its operation;
- continue to invest in low carbon projects such as renewable energy systems, using energy efficiency measures and electric vehicles to further reduce its carbon footprint and daily running costs. The council will support this commitment by ensuring that tree planting and habitat enhancement is prioritised;
- enable more healthy low carbon travel options, including walking, public transport and cycling, to reduce congestion, improve local air quality and enhance health and wellbeing;
- use its community initiatives, partnerships and waste contracts to make it easier for businesses and residents to share, repair, reuse and recycle; and
- make the wellbeing of its citizens a priority and support the resilience of all communities.

The Plan also lists a number of 'success measures', which include:

- increasing flood resilience and reduce levels of phosphate pollution in the county's river;
- reducing the council's carbon emissions;
- working in partnership with others to reduce county carbon emissions; and
- improving energy efficiency of homes and build standards for new housing.

At the time of writing, the council is preparing its new County Plan 2024-28, and recently consulted the public on a new set of commitments for the years ahead. These are set out under the themes of 'People', 'Place' and 'Growth'.

3.4 Other local strategies, policies and campaigns relevant to climate change

Following Herefordshire Council's declaration of a climate emergency in 2019, commitments were made to take major steps to minimise the council's impact on the environment. This included agreeing to:

- accelerate a reduction in emissions and aspire to become carbon neutral by 2030/31;
- deliver an updated carbon management plan and associated action plan for council emissions;
- work with strategic partners, residents and local organisations to develop a revised countywide carbon dioxide reduction strategy, aspiring for carbon neutrality by 2030; and
- use 100% renewably sourced energy where this provides the best carbon reduction return on investment.

In order to get the county of Herefordshire to net zero by 2030, the council has been working with a range of stakeholders to develop a more detailed breakdown of the key areas that will need to be addressed: energy, transport, food, housing and buildings, land use and farming, and waste.

The Climate Change and Nature Action Plan was subsequently developed by Herefordshire Council, which focussed on these six key areas.

Sitting alongside and supporting the Climate Change and Nature Action Plan and the county's net zero ambition is the **Greener Footprints communications and engagement campaign**. This has been designed to encourage, inspire and mobilise people and organisations from all sectors of the community to be part of a Herefordshire-wide "movement of positive action", in order to tackle climate change and protect the county's rich nature and wildlife.

The 16-strong Climate and Nature Partnership Board has been created to drive and steer the environmental ambitions and activities of the Climate Change and Nature Action Plan. Members of the board have relevant expertise and knowledge gained through their roles in conservation, wildlife, architecture, farming, the media, community energy, research, land management, agricultural policy and running businesses.

4. Herefordshire Core Strategy

A summary of existing Core Strategy policies relevant to climate change is set out below. These will be superseded by the policies set out in the new Local Plan, once adopted.

Policy SS1 – Presumption in favour of sustainable development

Aims to secure development that improves the social, economic and environment conditions in Herefordshire, as per national planning policy.

Policy SS7 – Addressing climate change

This is a strategic policy in the existing Core Strategy. It includes requirements for development to mitigate climate change such as by encouraging active travel, locating in the most sustainable locations and designing to reduce carbon emissions and use resources more efficiently. It also

requires development to incorporate measures to adapt to the impacts of climate change such as by minimising flood risk, reducing, re-using and recycling waste materials and incorporating measures to minimise the Urban Heat Island Effect.

Policy MT1 – Traffic management, highway safety and promoting active travel

Requires developments to incorporate measures to encourage active travel and minimise dependency on the private car. These measures help to mitigate climate change by reducing the county's carbon emissions.

Policy LD2 – Biodiversity and geodiversity

Requires development to protect nature conservation sites and habitats, restore and enhance existing biodiversity and geodiversity features and ecological networks, and creating new natural habitats, all of which play an important role in sequestering carbon from the atmosphere.

Policy LD3 – Green infrastructure

Requires development proposals to protect, manage and plan for the preservation of existing, and the delivery of new, green infrastructure, which can help to improve the mitigation of and adaption to climate change.

Policy SD1 – Sustainable design and energy efficiency

Requires development to ensure its long-term sustainability by making efficient use of land, maintaining local distinctiveness, utilising sustainable design measures to minimise energy input, maximising on-site renewable energy generation, and utilising sustainable construction methods.

Policy SD2 – Renewable and low carbon energy

States that development proposals that seek to deliver renewable and low carbon energy will be supported where they meet a set of criteria outlined in the policy.

Policy SD3 – Sustainable water management and water resources

Sets out the council's requirements regarding the management of flood risk, climate change adaptation, water conservation and efficiency, and the management of water resources.

Herefordshire Future Homes

Adopted in September 2021, Herefordshire Future Homes sets recommended standards for net zero homes developed by the council and its partners across the county. It is aimed at all stakeholders involved in the delivery of housing and is intended to accelerate the development of net zero housing in the region. It includes recommendations to ensure homes are healthy and comfortable, have excellent thermal insulation, have triple-glazed windows, no gas boilers, solar panels, heat recovery ventilation, and 92% saving in carbon emissions compared to standards set by Building Regulations.

5. What are the key issues facing Herefordshire?

The warming climate affects us all. The local impacts for Herefordshire include: more intense and frequent weather events such as flooding, heatwaves and storms.

Developing a future for Herefordshire in which greenhouse gas emissions are dramatically reduced, is key. However, the impacts of climate change are already being felt across the county

and will increase in severity in the future, no matter how quickly carbon emissions are reduced. Adapting to the warming that has already happened and the changes it will bring is key to building a resilient and climate responsive Herefordshire.

Flooding

Flooding is a particular problem in many parts of the county. Three of the eight most severe flooding events in the past 50 years have taken place since 2019, indicating that such events are becoming increasingly prevalent. Preventing, managing and reducing the risk of flooding from surface water, groundwater and ordinary watercourses across the county is crucial to addressing climate change and adapting to its consequences.

In this rural area, agriculture has an important role to play in reducing flood risk through; increasing infiltration into soils, slowing the flow of water and storing water within the upstream catchments of watercourses, for example.

Built up areas, with impermeable surfaces, create problems with flash flooding. The water run-off rapidly leads to flood drainage and sewerage systems being overwhelmed and causing flooding in vulnerable areas. In light of this, new developments should be located outside areas at risk of flooding and they should be built with integrated Sustainable urban Drainage Systems (SuDS).

Water Availability and Quality

Increasing droughts cause adverse effects on water environments, creating not only a problem of water shortage but larger environmental issues as well. Where there is discharge of treated wastewater effluent into rivers with low flows, this means that less dilution takes place than would be the case under normal conditions.

A wide range of contaminants can reach the river either via groundwater or through drainage ditches. In an agricultural county such as Herefordshire, this could include residues of artificial fertilizer, insecticides, herbicides, pesticides and farmyard waste - all of which are potentially very harmful and could have significant implications for the county's biodiversity, habitats and species. This is a significant concern when considering that Herefordshire supports the greatest length of river designated for its conservation value of any county in England - the River Wye - which has been considered the best salmon river in England; important for both conservation and tourism, and designated as a Site of Special Scientific Interest (SSSI) and European Special Area of Conservation (SAC); a strictly protected site designated under the EC Habitats Directive. Part of the River Lugg catchment also falls under the River Wye SSSI and SAC. However, in recent years the water quality of the River Wye SAC and its catchment, has been in serious decline due to high levels of nutrients and sedimentation, which are damaging its fragile ecosystem.

In addition, water quality and availability are closely linked, meaning that lower quality would result in less water available for abstraction - which could have implications for new development; in particular the provision of new housing. Mineral workings can also have a significant impact on water resources and the emerging Minerals and Waste Local Plan seeks to mitigate adverse impacts. The Local Plan will be subject to a Habitats Regulations Assessment to consider the direct impacts on habitats and species in the River Wye SAC.

Agricultural developments can also cause stresses on water quantity and quality, however these are often outside planning control mechanisms. To mitigate against water stress, the use of reservoirs could be considered to allow for the abstraction and the storage of water during the winter, which can then be used for irrigation purposes during the summer, when water is less available.

Agriculture

In this rural county, farming is a key activity. Changes to the climate will lead to more pressure on farmers to adapt by altering the way they both rear animals and grow crops. As temperatures rise, extreme weather events will increase and hotter, drier summers will become the norm, therefore moving away from traditional agricultural practices is important in both tackling climate change and adapting to its consequences. For example; flood risk can be reduced by altering land and water management practices, such as through better soil management, growing over-winter ground cover, water retention, trackway improvements, tree planting, rainwater harvesting, meadow creation, new wetland ditches, etc. However, it should be noted that many agricultural practices and activities cannot be influenced by planning policy and organisations other than Herefordshire Council are involved in their management.

Transport and air quality

The rural nature of Herefordshire, together with limited availability of public transport options, means that its population is highly dependent on road transport. Reducing the need to travel, particularly by car, by locating development in the most sustainable locations is key. These are places where access to employment, shopping, education, health, recreation, leisure and other services are available by public transport, walking and cycling.

Herefordshire's air quality problems are mainly related to traffic. Air quality in parts of Hereford and Leominster, in particular, is poor. Land use planning should ensure that future development does not exacerbate this. Local Transport Plans seek to improve accessibility, air quality, safety and ease congestion and Local Plans ensure that sustainably located areas of growth and development support these aims.

Employment

Being a predominantly rural, sparsely populated county, means that many of Herefordshire's residents have to commute to their places of work. The policies of the emerging Local Plan should ensure that people live close to places of employment and also have the opportunity to work from home. Live/work opportunities can also provide opportunities for growth in the rural economy, which has been historically dependent on agriculture. Planning growth in this way can result in significant benefits to the climate, since working close to places of employment or from home would result in reductions in carbon emissions from travelling, and the need for less heat, power and water. Working from home would also cut the demand on natural resources, since only one building would be required in which to both live and work.

New employment/commercial/industrial sites should be developed in an environmentally sensitive way, with the whole life-cycle of the building being considered; from construction through to end-of-use. Opportunities to share heat with neighbouring land users via District Heat Networks can also bring considerable environmental benefits through energy efficiency gains.

Biodiversity

Herefordshire is known for its traditionally farmed countryside, forestry and rural character. However since the 1950s Herefordshire's grasslands and pastoral landscapes have rapidly declined, which coincides with a move towards increasingly intensive arable farming. Despite this however, the county still retains a significant proportion of the West Midlands region's biodiversity interest, with several internationally, nationally and locally designated sites and habitats. However, climate change is already leading to biodiversity loss and, together with other pressures such as changes in land use and the spread of alien species, will accelerate the loss of our most at risk species and habitats.

Minerals and Waste

The emerging MWLP has been prepared with the key aim of addressing climate change, both through mitigation and adaptation. This includes: ensuring that minerals are extracted efficiently, whilst avoiding unacceptable harm and achieving a high quality of reclamation and after use; minerals and waste development minimise energy and water usage, for example through good site design, reduced transport movements and circulating water within operations to reduce overall demand; designing buildings and plant to reduce resource requirements and consequent carbon emissions, for example through the use of ultra-low emission vehicles (including non-fossil fuels and electric vehicles) and renewable energy supply. Development will be expected to increase resource efficiency measures in plant, buildings and operations in order to achieve climate change priorities.

Reclamation of sites also provides opportunities, for example in assisting ecological networks to be more resilient, enabling the movement of wildlife as it adapts to a changing climate. The after-use of a site can also deliver objectives to address climate change, for example creating a new habitat that also provides flood storage to alleviate risks elsewhere.

The emerging MWLP also requires resource audits for new developments. This will assist in ensuring that future minerals and waste projects are developed with sustainability as a key factor.

Sustainable waste management in Herefordshire should deliver: a reduction in the amount of waste generated; an increase in the amount of waste re-used, recycled or used to recover energy; and a decrease in the amount of waste disposed to landfill. Consequently, the policy priority set out in the emerging MWLP is to move waste up the management hierarchy and deliver a circular economy. This will be achieved through the provision of a positive framework within which to bring forward additional waste management capacity, addressing all levels of the waste hierarchy (except non-hazardous disposal) and making development opportunities for residual waste treatment facilities particularly attractive.

The MWLP has been developed alongside national and local waste management strategies and targets, which may change over time and should always be applied and referenced when waste development proposals are considered.

Energy insecurity and the need for renewable resources

Using renewable energy is an essential component of a sustainable future. As a consequence, it is imperative to look at ways in which we can reduce our energy consumption and promote the development of renewable energy resources. In Herefordshire, large-scale renewable energy schemes may involve wind, solar or the development of heat networks and, at a smaller scale, new developments may include ground or air source heating, solar panels, local power generation schemes, energy efficient and heat resilient building design or electric vehicle charging points.

A successful future for Herefordshire is one where its population deals with the move towards a post-carbon era in a joined up and holistic way, assisted by a positive land use policy framework in the Local Plan.

Energy efficiency and fuel poverty

There are increasing numbers of households across Herefordshire that cannot afford to keep their homes warm. This affects both quality of life and health. The young and old, those with disabilities or long-term illnesses are particularly vulnerable. Fuel poverty is caused by a combination of poor energy efficiency in homes, high energy prices, low incomes and the current trend of rising general inflation.

Building new homes to a high standard of energy efficiency, linked with other local initiatives which help residents to reduce their fuel bills through saving energy, and assist in accessing home improvement grants and other benefits, will help reduce health and debt problems as well as lessen emissions produced from burning fossil fuels and therefore help to mitigate climate change.

Design and construction

For development to be considered sustainable, it must embrace the move to a low carbon future through designing buildings that are more energy efficient and increase the use and supply of renewable energy. Herefordshire Council will seek and ensure that future developments are designed to enhance local distinctiveness but without stifling innovation and creativity, particularly with regard to energy efficiency.

The Local Plan will continue to strive to deliver new developments which achieve high environmental standards to ensure that new buildings are fit for the future, from their planning and construction, through to their active use and also to their end-of-life.

6. Climate Change and the Herefordshire Local Plan 2021 – 2041

6.1 What can the Local Plan achieve?

The planning system can influence land use and contribute to combatting climate change through the reduction in greenhouse gas emissions and by ensuring that developments are adapted in response to our changing climate. Planning can enable and drive the delivery of sustainable forms of growth and development.

The Local Plan can make a significant contribution to protecting people and the environment from the potential adverse effects of climate change, including by:

- controlling the type and location of new development;
- promoting the use of renewable and zero/low carbon energy technologies through strongly worded policies and providing the mechanism needed to achieve significant reduction in CO₂ emissions;
- managing travel demand and encouraging sustainable modes of transport through the location of new development, housing densities and the layout and design of new buildings;
- locating growth away from areas at risk of flooding and ensuring that sustainable urban drainage strategies are integral to new developments, along with new green and blue infrastructure strategies to assist with flood storage and slowing down the flow of watercourses; and
- introducing strategies to ensure that new development minimises impacts on water quality and incorporates measures to minimise water consumption and maximises water recycling.

6.2 Local Plan consultations

Spatial options (Jan 2022)

This consultation outlined the proposed vision and objectives of the Local Plan and asked if these were considered to reflect people's priorities for Herefordshire. In addition, consultees were asked which of the options for strategic spatial growth over the 20-year plan period they preferred.

Results showed that approximately 64% of respondents agreed with the proposed Vision and Objectives, and highlighted a number of commonly recurring themes. Those below relate specifically to climate change related matters:

- support for increased use of electric vehicles;
- need to acknowledge differences in practicalities of active travel in urban and rural areas;
- new development should be concentrated around railway stations;
- relationships between protection of habitats for wildlife and natural infrastructure and climate change;
- improved drainage and flood defences;
- drive for renewable energy sources and sustainable heating methods for new development;
- enabling communities to cope with effects of climate change;
- importance of sustainable farming practices and protection of soil;
- emphasis on good quality, sustainable affordable housing;
- opportunity to address all aspects of environmental issues; and
- recognition of new technologies and changed working lifestyle practices;

In respect of the 5 spatial options for growth in the urban parts of Herefordshire, the majority (39%) of respondents voted in favour of focussing growth across Hereford and the market towns. Focussing growth in the urban areas is a more sustainable pattern, as people will be living and working in areas which already have services and facilities to support them, as well as better access to public transport.

In the rural villages, the majority of those taking part in the consultation (30%) preferred growth to be focussed in settlements outside the National Landscapes (formerly known as Areas of Outstanding Natural Beauty) and Conservation Areas.

Policy options (Jan – Feb 2022)

Consultees were asked which of three climate change policy options they would like to take forward. The results were:

- Option 1: 22% - retain an overarching strategic climate change policy
- Option 2: 23% - integrate climate change into other policies
- Option 3: 55% - have a combination of options 1 and 2.

The emerging draft Local Plan sets out an overarching strategic climate change policy, which details how new developments should both mitigate and adapt to our changing climate. At the time the Policy Options consultation was undertaken, the intention was to adopt a Local Plan containing both strategic, place-based and more prescriptive development management policies, similar to the existing Core Strategy. However, the proposed changes to the national planning system (which have since been publicised) include the introduction of national development management policies to replace those set locally. It was with this in mind that the decision was later made to publish strategic and place-based policies only in the anticipation that the more detailed policies will be introduced by the government in the medium term. This means that there

will now not be the opportunity to include some of the more detailed policy measures to tackle climate change in the new Local Plan.

However, it should be noted that some of the other strategic policies do indirectly help to address climate change. For example, *Policy EE1: Protecting and enhancing the quality of the natural environment* requires development to facilitate the positive impacts the natural environment has with respect to climate change mitigation and to protect, conserve and enhance natural capital and green and blue infrastructure which helps to absorb carbon from the atmosphere, and to utilise green space to help mitigate the effects of climate change.

The Herefordshire Design Code, which is being produced alongside the Local Plan, also provides an opportunity to embed more detailed planning policies to help tackle climate change.

Place shaping options (June – July 2022)

Respondents were asked to rank, in order of preference, a number of sites in Hereford and the market towns. Although these are not directly related to climate change matters, it was of note that preference was shown for growth on previously developed land, particularly in Ledbury and Ross-on-Wye, and for land in town centres.

The consultation also asked for people to note down any other sites they thought might be suitable for growth and why they had identified them. The most popular reason was that a site had good transport connections, which can help to support lower carbon emissions.

For development in the rural areas, most (59%) preferred Option 1a – in the most sustainable settlements across the whole county, as opposed to the most sustainable across each Housing Market Area. 79% thought that proportional growth was the most suitable way to distribute rural housing growth to settlements (as opposed to enhanced growth in particular settlements).

6.3 Evidence base

6.3.1 International evidence

International Panel on Climate Change (IPCC): this is the United Nations body for assessing the science related to climate change. It prepares regular Assessment Reports about the state of scientific, technical and socio-economic knowledge on climate change, its impacts, future risks, and options for reducing the rate at which climate change is taking place. The [Sixth Assessment Report](#) was issued in March 2023.

6.3.2 National evidence

UK Climate Change Risk Assessment (CCRA): The Climate Change Act 2008 requires the UK government to produce a UK CCRA every five years. The third of these ([CCRA3](#)) was published by the Government in January 2022.

CCRA3 presents strong evidence that, even under low warming scenarios, the UK will be subject to a range of significant and costly impacts unless significant further action is taken now. For example, if further action is taken, under a 2°C by 2100 warming scenario, annual damages from flooding for non-residential properties across the UK is expected to increase by 27% by 2050 and 40% by 2080. At 4°C this increases to 44% and 75% respectively. The evidence shows that we must do more to build climate change into any decisions that have long-term effects, such as in new housing or infrastructure, to avoid often costly remedial actions in the future.

The UK government is committed to developing a third *National Adaptation Programme* (NAP3) for England which will set out how we will meet that challenge. A holistic approach is required, which will include accounting for the synergies between adaptation and mitigation. Successful mitigation will ensure adaptation remains achievable.

The UK government is also considering the approach to the fourth CCRA, with the aim of scaling up the level of ambition compared to previous CCRA's. The aim is to provide an enhanced spatial perspective to risk assessment that will provide better support to action at a local level, where this is appropriate.

UK Climate Projections: These provide up to date assessment of how the UK climate may change in the future, which are available at 2.2km resolutions (UKCP18) for local risk assessment.

UK Climate Resilience Programme: uses UKCP18 to build the evidence on climate risks, adaptation and services in the UK. It sets out high impact outputs including climate risk indicators to support climate risk assessments.

Environment Agency (EA): the work of this government organisation seeks to create better places for people and wildlife and supports sustainable development. Their responsibilities include taking a strategic overview of the management of all sources of flooding, including providing evidence and advice to inform Government policy.

The EA produces programmes which are closely linked to the effects of climate change, its impacts and need for mitigation and adaptation, including the Joint Water Programme and the Air, Land and Water Research Programme.

6.3.3 Local evidence

Herefordshire Council's [climate change web pages](#) provide information on how carbon neutrality will be achieved across the county. Included are links to council greenhouse gas emissions reports.

The Herefordshire *Level 1 Strategic Flood Risk Assessment* (2019) (SFRA) assesses the risk of flooding from all sources, now and in the future. It takes into account the impacts of climate change and assesses the impact that land use changes and development within Herefordshire could have on future flood risk. This will be updated as part of the production of the emerging Local Plan.

Understanding Herefordshire: this is a [Herefordshire Council linked web page](#), which provides statistical information on a variety of issues across the county. It has a specific climate change and greenhouse gas emissions page, which contains useful links, including to: the Midlands Intelligence Hub's CO₂ dashboard on the level and sources of emissions in the county and across the Midlands region; and Office for National Statistics information on CO₂ emissions and woodland coverage.

Previous data on carbon emissions for Herefordshire has been provided by the Government. This is a territorial-based footprint, which is based solely on emissions from energy use in the county. It does not include emissions from non-energy sources, such as methane. The Herefordshire Climate Change and Nature Partnership has agreed to widen the measured footprint to include a new set of emissions (referred to as CO₂ equivalents), including those from agriculture, providing a better reflection of the county. In addition, the partnership is also looking at Herefordshire's

consumption emissions. The footprint is based on the choices people make, and how people choose to live their lives. This includes emissions from things that are produced outside Herefordshire, but consumed within the county, such as almost all of their food, clothing, appliances, as well as other services they use such as financial and banking services. It gives a different view of the county's carbon footprint, which will help to develop community level actions to tackle them.

A Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004 and is mandatory for Development Plan Documents. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA was commissioned for the Draft Herefordshire Local Plan Regulation 18 consultation stage.

The SA concluded that *Policy CC1: A carbon neutral Herefordshire* is expected to have a significant positive effect on the following SA objectives:

- 1 (climate change) as the overall purpose of the policy is to achieve climate change mitigation and adaptation, including by reducing energy consumption, increasing renewable energy generation and supporting battery energy storage systems.
- 9 (travel) as the policy encourages sustainable and active travel will also benefit the health of local residents and air quality, as will the reduction in congestion associated with the Hereford relief road.
- 14A (flood risk) and 14B (water quality and quantity) as the policy seeks to improve water quality and reduce flood risk. The policy limits the amount of development in areas of high flood risk and promotes the use of natural flood management features in new developments. It also requires residential and non-residential developments to achieve specified water efficiency targets.

A minor positive effect is likely in relation to SA objectives:

- 6 (physical and mental health and wellbeing) and 10 (air quality) as the policy seeks to encourage sustainable and active travel.
- 5 (access to services, facilities and education) and 8 (employment and reducing inequality and poverty) as the policy encourages reductions in the need to travel.
- 7 (economy) as the policy supports a circular economy and a low carbon economy and encourages commercial developments to be located close to active travel routes, which will improve access to jobs for more people.
- 11 (biodiversity and geodiversity) as the policy supports the delivery of high quality, interconnected and multifunctional green and blue infrastructure.
- 15 (resources) as the policy promotes the transition to a circular economy, stating that development proposals must minimise waste, maximise the reuse of materials, and prioritise low embodied carbon materials.

A probable but uncertain negligible effect is likely in relation to SA objective 12 (landscapes and townscapes) as the policy refers to how large-scale renewable energy schemes, as well as the diversification of renewable energy schemes with other uses, will be supported where there are no 'significant landscape/environmental impacts'.

As with the SA, a Habitats Regulations Assessment (HRA) is a statutory requirement and refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs.

The HRA screening found that no 'likely significant effect' predicted for Policy CC1. The policy will not result in development and therefore will not result in significant effects on European sites.

6.4 Preferred policy direction

The Local Plan will replace the existing [Core Strategy](#) and will guide development up to 2041. This section of the background paper will set out Herefordshire Council's preferred approach to the formation of the draft Local Plan's Vision and Objectives and *Tackling Climate Change* strategic policy area.

As already discussed, climate change should be addressed through a wide range of policy areas. A single strategic policy – *Policy CC1: A carbon neutral Herefordshire* – takes a holistic approach to tackling climate change. Below, a breakdown of how the draft Local Plan's Vision and Objectives addresses the need to tackle climate change is provided. In the section thereafter, the wording for each policy criterion in Policy CC1 is provided in italics together with an explanation of why that policy approach has been chosen.

6.4.1 The Local Plan's Vision and Objectives

The 'Environment' pillar of the draft Local Plan's Vision sets out the council's goal of achieving carbon neutrality across the county and how enabling its residents to travel in a more sustainable way is central to this. It also highlights the importance of preserving and enhancing the county's landscape and natural environment.

The 'Community' pillar of the vision states that the county will have 'resilient' communities in which everyone is able to live healthily. The health and wellbeing of the county's residents will also be enhanced. The predicted future impacts of climate change will have a significant impact on people's health and wellbeing. It will therefore be necessary to re-engineer Herefordshire's built environment to ensure that people are not negatively affected by its impacts, such as from flooding and overheating.

The 'Economy' pillar of the Plan's vision emphasises the importance of building a 'sustainable' economy and continuing to support and enhance sustainable tourism.

Several of the Plan's environmental objectives relate to tackling climate change. These include the following:

- 1 - To ensure that development requires significantly less energy use and to increase the amount of energy generated from renewable sources, with a requirement for all new developments to be carbon neutral;
- 2 - To protect communities from the worst impacts and dangers of climate change, including from flooding and heat stress;
- 5 - To maximise biodiversity, enhance and extend Herefordshire's natural capital, green and blue infrastructure and nature recovery networks while significantly increasing tree cover in Hereford and the market towns;
- 6 - To ensure high quality and sustainable design of buildings and spaces taking into account local character and protecting local heritage assets and their settings;
- 8 - To minimise and carefully manage the use of natural resources, including minerals, land, and water and to encourage the reduction, reuse and recycling of waste, to achieve a circular economy; and

- 9 – To significantly improve air quality.

The Plan's community objectives that are relevant to tackling climate change include the following:

- 10 - To provide inclusive connectivity, development and infrastructure for all;
- 11 - To ensure that all new development supports the health and wellbeing of its occupants in accordance with the Healthy Homes Principles (two of these principles are relevant: i) *“All new homes must secure radical reductions in carbon emissions in line with the provisions of the Climate Change Act 2008”*; and ii) *“All new homes must demonstrate how they will be resilient to a changing climate over their full lifetime”*.);
- 12 - To ensure that all residents are well connected to nearby services and facilities for daily requirements; and
- 14 - To support good health and wellbeing, through easy access to open space, sports facilities, and active travel options.

The Local Plan's economic objective that is relevant to tackling climate change includes:

- 22 - To ensure that all new development is accompanied by fast and reliable digital connectivity; and
- 23 - To support the transition to a carbon neutral and circular economy, and the creation of 'green' jobs.

6.4.2 Policy CC1: A carbon neutral Herefordshire

As previously discussed, the evidence suggests that strong planning policy is needed across a number of different policy areas to tackle climate change. Policies required fall into two categories: i. climate change *mitigation*; and ii. climate change *adaptation*. Climate change mitigation measures include any policy which supports the reduction of carbon emissions and climate change adaptation measures include any policy which supports the adaptation of the built environment to improve communities' resilience to the current and predicted future impacts of climate change. The following section of this report details the justification for the council's preferred policy direction for tackling climate change through the Local Plan.

Mitigating climate change

Demonstrating carbon neutrality on-site

“Demonstrating operational carbon neutrality on-site, through a fabric-first approach to its design, low carbon technologies, on-site renewable energy generation and carbon offsetting. Measures should be taken to minimise carbon emissions across the full lifecycle of the development before carbon offsetting is considered”;

The Climate Change Act 2008 commits the UK to achieving net zero carbon emissions by 2050. Herefordshire Council has set a more ambitious target of achieving net zero emissions across the county by 2030. Given that development built now will still be standing in 2050, it is imperative that it is built to carbon neutral operational carbon standards. In the first instance, the priority should be to minimise the demand for energy-use across the life-cycle of the development by achieving extremely high energy efficiency standards. Any additional energy required to heat the development should be derived from renewable sources, wherever possible. If it is not possible to meet 100% of energy demand from renewable sources, then any remaining residual energy should be offset through carbon offsetting measures. This may include a contribution to a carbon offset fund.

High levels of energy efficiency

"Maximising opportunities to secure significant reductions in carbon emissions for residential developments, by achieving energy efficiency standards in line with statutory and regulatory requirements. Major non-residential developments should demonstrate how they achieve BREEAM 'Excellent', or an equivalent or better methodology";

The Planning and Energy Act 2008 sets out powers for local planning authorities to set energy efficiency standards that exceed the energy efficiency requirements of Building Regulations. The standards set out in Building Regulations do not go far enough to achieve net zero and therefore a more ambitious approach is required. 'BREEAM' is widely considered to set the standard for best practice in sustainable building design, construction and operation, and by requiring non-residential development to achieve their 'Excellent' standard the Local Plan can ensure that new development minimises carbon emissions and improves the comfort of occupants.

Renewable energy sources on-site

"Maximising opportunities to generate energy from renewable sources on-site, such as from wind and solar. Neighbourhood Development Plans are strongly encouraged to support the provision of new community-owned energy schemes";

After taking a fabric-first approach to minimise the amount of energy required to heat a building, it is essential to ensure that as much of the additional energy required to heat it as possible is generated on-site through renewable energy technology.

Community-owned energy schemes have a key role to play in contributing to the supply of renewable energy to the National Grid and also directly to new developments. This is why the policy encourages Neighbourhood Development Plans to support the provision of new schemes.

Renewable sources off-site

"Maximising opportunities to source and/or generate energy from renewable sources off-site. Where evidence demonstrates that this is feasible, strategic sites should be connected to a District Heat Network. Where feasibility is not demonstrated, new homes should be built with the necessary infrastructure in place to enable such connections to be easily integrated in the future. In particular, opportunities should be sought to connect commercial development, producing sufficient levels of waste heat, with residential development, where they are located within close proximity. District Heat Networks should be planned from the outset. Large-scale renewable energy schemes and diversification of renewable energy schemes with other uses will be supported where the landscape and environmental impacts are considered acceptable";

While the provision of on-site renewable energy provision should be the priority for new developments, it is recognised that it may not always be feasible or viable to meet all energy demand in this way. Therefore the policy requires developments to maximise opportunities to source additional energy from renewable or low-carbon sources off-site, such as through connection to a District Heat Network.

Promoting active travel / modal shift

"Designing to provide an improved choice of transport modes, such as by making it as safe and easy as possible to walk, wheel and cycle to essential facilities and services, and by locating within walking distance of public transport nodes. Active travel should be encouraged through the design of the built environment, such as through the creation and enhancement of walking and cycling links in accordance with the principles of well-connected neighbourhoods. These should be integrated with new and existing green and blue corridors, wherever possible. Extensive measures to encourage active travel and micromobility within Hereford will be supported alongside any new road or other transport infrastructure, to reduce traffic in the centre of the city. Similar measures will also be supported in the market towns";

Over a quarter (28%) of Herefordshire's carbon footprint is caused by the way people travel around. Private vehicles are responsible for a significant contributor to this. When locating and designing new development, it is therefore essential to ensure that reliance on the private car is minimised and measures to encourage people to walk, cycle or wheel short distances are maximised to provide people with a greater choice of transport options. This can be achieved in several ways, including by locating development in areas with accessible and safe walking and cycling connections to local shops and services, close to public transport nodes such as bus stops and train stations, providing good quality, accessible and attractive off-road active travel routes linking the development to shops, services and local employment hubs. Well Connected Community design principles should be incorporated to ensure that all new developments are situated within a short walk from shops, services and employment hubs.

A new western road corridor is now planned for the city of Hereford with the view to drawing traffic away from the city centre. This will provide the opportunity to significantly improve active travel measures along the A49 which runs through the city's centre. These measures will help to improve air quality in the city centre while also encouraging more people to walk, cycle and wheel for shorter trips within Hereford.

Green infrastructure for sequestering carbon

"Delivering high quality, interconnected and multifunctional green and blue infrastructure, which will be designed to provide 'carbon sinks', sequester carbon and improve air quality. Green and blue infrastructure should be seen as an integral part of development and planned from the outset. To improve air quality, tree planting and other carbon sequestering habitat types should be prioritised alongside busy roads";

Green infrastructure such as trees, green roofs and walls, and natural and semi-natural green spaces all perform important functions by absorbing carbon from the atmosphere. Therefore, it is important that development takes steps to both protect and enhance existing green infrastructure and create new green infrastructure to sequester as much carbon as possible to mitigate climate change.

A carbon sink is anything that absorbs more carbon from the atmosphere than it releases and therefore includes green infrastructure, the ocean and soil. Green infrastructure planted alongside busy roads can help to filter out harmful air pollutants emitted by vehicles.

Electric Vehicle charging

"Ensuring that electric vehicle (EV) charging points are installed in every new home with off-street parking, and outside commercial developments, village halls, and community facilities and services. This should be supplementary to active travel and public transport infrastructure";

While modal shift should be the priority, it is understood that, for some rural communities, it may be more difficult to switch use of the private vehicle for walking, cycling, wheeling or public transport. It is therefore essential that electric vehicle (EV) charging points are installed wherever possible, to encourage residents to purchase low-emissions vehicles.

Minimising waste and maximising reuse of materials

"Supporting the transition to a circular economy by minimising waste, maximising the reuse of materials, and prioritising low embodied carbon materials. Where possible, developments should use local resources and locally sourced materials."

Paragraph 8 of the NPPF sets out its objectives for achieving sustainable development. Its environmental objective includes the minimisation of waste as an important factor. In order to adequately address climate change, it will be important to minimise the quantity of raw materials used to manufacture products around the world. The reuse of waste materials should therefore be

maximised through extensive recycling, including of building materials at the point of demolition. Raw building materials should be sourced locally, wherever possible, and consideration should be given to materials which have low embodied carbon.

Locating commercial development close to active travel routes and providing cycling facilities

“Ensuring that commercial development is located close to active travel routes which link to residential development. Such development should provide secure bicycle parking and showering facilities for employees.”

As discussed above, the location of development is essential for ensuring that emissions from transport are kept to a minimum. Therefore non-residential development must be located in locations that are accessible either on-foot, by bike or public transport. Secure bicycle parking and showering facilities provided as part of the development encourage people to cycle to and from work.

Minimising detrimental impact on county’s soils

“Minimising detrimental impact on the county’s soils, recognising their importance in sequestering and storing carbon.”

Soil sequesters and stores large quantities of carbon. It is therefore very important that development minimises its impact on soils to prevent large amounts of carbon from being released into the atmosphere.

Battery energy storage systems

“Supporting proposals for battery energy storage systems, where they are appropriately located and designed in accordance with relevant policies of the Plan. Such developments should minimise and mitigate any potential risks arising to the environment and public safety”;

The installation of battery energy storage systems allow the opportunity to store energy generated from renewable sources for use on-site.

Adapting to climate change

Designing development to be resilient to future impacts of climate change

“Being designed to be resilient and adaptive to the future impacts of climate change to ensure people’s safety, taking into account the known physical and environmental constraints, over their full lifetime. Buildings must be able to withstand the impact of extreme conditions, such as from flooding and heat exposure. Schemes should minimise the risk of overheating, now and in future, through the careful design and placement/orientation of buildings. Appropriate low energy ventilation measures should also be incorporated to maximise people’s comfort in a changing climate”;

New developments must be carefully designed to be resilient to both the current and predicted future impacts of climate change. The Climate Change Committee’s *Independent Assessment of UK Climate Risk* (June 2021) highlights the highest priorities for further adaptation to climate change. These include:

- risks to the viability and diversity of terrestrial and freshwater habitats and species;
- risks to soil health from increased flooding and drought;
- risks to natural carbon stores (such as soils and green infrastructure);
- risks to crops, livestock and commercial trees;
- risks to the supply of food, goods and vital services due to climate-related collapse of supply chains;

- risks to people and the economy from climate-related failure of the power system;
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and buildings; and
- risks to the UK from climate change impacts overseas.

Avoiding areas at risk of flooding

“Being located in accordance with the Sequential Test and the Exceptions Test (where appropriate) and have regard to the Strategic Flood Risk Assessment. Areas at risk of flooding, both now and in future, should be avoided and development should contribute to reducing flood risk on site without exacerbating flood risk elsewhere.”

As discussed above, flood risk will greatly increase in future due to climate change. Development will therefore need to be located away from areas that either are currently impacted by flood risk or will be over the course of its lifetime (100+ years).

Paragraph 168 of the NPPF states that the aim of the sequential test should be to steer new development to areas with the lowest risk of flooding from any source. Paragraph 169 in the NPPF states that the exception test should be applied to development sites if it is not possible for it to be located in areas with a lower risk of flooding.

Natural flood management

“Incorporating natural flood management features, such as Sustainable Drainage Systems (SuDS), into its design to reduce surface water runoff. SuDS should be designed to provide amenity value and natural habitats for wildlife and considered at the earliest stage of development.”

Natural Flood Management systems mimic the way that nature supports the alleviation of flood risk. Paragraph 167 of the NPPF states that all plans should try to avoid flood risk to people and property by making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management.

Water efficiency

“Incorporate water efficiency, water recycling and rainwater harvesting measures to mitigate the impact of drought and reduce resource and associated energy consumption. In order to minimise adverse impacts on water quantity and quality, new residential developments must achieve water efficiency targets of: a minimum of 110 litres per person per day in areas outside the Rivers Wye and Clun Special Areas of Conservation (SACs) and 100 litres per person per day within these SACs. Non-residential development is expected to achieve a minimum of 3 credits under the measure “Wat01” of the BREEAM New Construction Standard.”

The effects of climate change will cause periods of drought to become more frequent and therefore water efficiency measures should be incorporated into the design of every new development to minimise consumption. By maximising opportunities to recycle water, the impact on water quality can be minimised.

7. Tackling climate change through Design Codes

This background paper focusses on the development of the *Tackling Climate Change* strategic policy in the Local Plan. It is anticipated that further detail on how new development should be designed to achieve carbon neutrality and adapt to climate change will be provided in the Herefordshire Design Code and subsequent design codes produced at the city/market town and neighbourhood level. County-wide Design Codes are a legal requirement, set out in the Levelling Up and Regeneration Act 2023, and provide a set of rules shaping the design of development, both in terms of the physical design of buildings and at the wider neighbourhood level.

8. Further evidence / Next steps

A Herefordshire Renewable Energy Survey was published in 2024. This study produced a set of county-wide GIS maps which show where wind and solar energy is best positioned to maximise its benefits, taking into account local constraints and opportunities.

A Local Plan Carbon Assessment is planned, which will provide a detailed technical assessment of the carbon impact associated with each of the spatial options originally put forward as part of this Local Plan process, and the combined carbon impact of the site allocations chosen and draft plan policies at Regulation 18 stage. This will inform the preparation of the submission Local Plan at Regulation 19 stage.

A Ross-on-Wye District Heat Network Feasibility Study is also currently being produced by consultants for the proposed urban extension to Ross-on-Wye. This is investigating the feasibility of developing district heat networks in association with the level of planned growth at the site (through the emerging Local Plan).